VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

669 County Square Drive
Ventura, CA 93003
805/645-1400

PART 70 PERMIT

DRAFT

Number 01494

Permit Term: xx, 2013 to December 31, 2017

Company Name / Address:
Venoco, Inc.
6267 Carpinteria Avenue, Suite 100
Carpinteria, CA 93013-1423

Facility Name / Address:
Platform Gail
OCS Lease P-0205
Offshore of Ventura, CA

Responsible Official:
Mr. Larry Huskins
Operations Manager
805/745-2100

Title V Contact:
Mr. Pat Corcoran
Environmental Coordinator
805/745-2264

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.

For:

Terri Thomas, Supervisor
Engineering Division

Michael Villegas
Air Pollution Control Officer

Issue Date

PART 70 PERMIT NO. 01494
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1.a. PERMIT REVISIONS TABLE

Application No.	Issue Date	Description	Revised Permit Sections
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01494-201	05/03/99	Modified Condition No. 4 of Attachment 74.23N2/1494: turbine water to fuel ratio limits / Minor Part 70 Permit Modification	• Signature Cover Page • Attachment 74.23N2/1494
01494-TOO	05/03/99	Transfer of Ownership / Administrative Part 70 Permit Amendment	• Signature Cover Page • Table of Contents • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1
01494-211	09/28/99	Replaced Workboat Engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4
01494-ADM2	03/13/00	District revised permitted emissions to reflect the use of standard calculation methods / Administrative Amendment	• Signature Cover Page • Permit Revisions Table • Table No. 4 • Attachment PO1494PC1
01494-221	10/11/00	Modified Turbine Water to Fuel Ratio Permit Condition / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Attachment 74.23N2/1494
01494-241	11/13/00	Additional crew boat and work boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Table of Contents • Permit Revisions Table • Periodic Monitoring Summary • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1

Application No.	Issue Date	Description	Revised Permit Sections
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01494-271	05/10/01	Modified Permit Condition Limiting Simultaneous Use of 1300 BHP Detroit Diesel Backup Generator / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 4 • Attachment PO1494PC4
01494-261	08/27/01	Increased Permitted Throughput at Low Pressure Flare / Minor Part 70 Permit Modification Administrative Amendment to change company address and phone numbers	• Signature Cover Page • Permit Revisions Table • Table No. 3 • Table No. 4 • Attachment PO1494PC2
01494-291	11/14/01	Additional work boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1
01494-251	01/13/03	Add new well – Modify oil well list / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Oil Well List • Attachment PO1494PC1
01494-311	01/13/03	Permit Reissuance for Period: January 1, 2003 – December 31, 2007	See "Stationary Source Description"
01494-281	01/21/04	Upgraded (efficiency) of turbines G-1 and G-3 / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment 74.23N2/1494

Application No.	Issue Date	Description	Revised Permit Sections
01494-331	01/21/04	Additional crew boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1
01494-341	11/02/04	Additional crew boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1
01494-351	03/18/2005	Additional crew boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1
01494-361	08/01/05	Permit Emergency Engine / Minor Part 70 Permit Modification	• Signature Cover Page • Table of Contents • Permit Revisions Table • Periodic Monitoring Table • Table No. 2 • Applicable Requirements Code Key • Table No. 3 • Table No. 4 • Insignificant Activities Table • Attachment ATCM Engine N3 • Attachment 57.1
01494-381	01/09/06	Additional crew boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1 • Attachment 74.6(2003)

Application No.	Issue Date	Description	Revised Permit Sections
01494-401	11/30/06	Removal of selected tanks from the permit / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment 74.9N7
01494-411 01494-371	05/08/07	App. 411: • Revise engine BHP for a crew boat engine • Add crew boat engines • Revise turbine water to fuel ratios App. 371 Change Turbine G-02 Model Configuration to a 501-KB5 Minor Part 70 Permit Modifications	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment 74.9N7 • Attachment 74.9N8 • Attachment 74.9N9 • Attachment 74.23/1494 • Attachment PO1494PC1
01494-372 01494-421	06/09/08	App. 372: Permit Turbine G-1 with SCR App. 421: Permit Reissuance for Period: Issue Date – December 31, 2010	See "Permit Summary and Statement of Basis"
01494-301 01494-373	03/23/09	01494-301: Added Wells / Revised Well List and Changed Responsible Official 01494-373: Permit Turbines G-2 and G-3 with SCR Minor Part 70 Permit Modfications	• Signature Cover Page • Permit Revisions Table • Permit Summary and Statement of Basis • Table No. 2 • Table No. 3 • Table No. 4 • Oil Well List • Attachment 74.23N21494 • Attachment PO1494PC1
01494-431	08/10/09	Additional crew boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1

Application No.	Issue Date	Description	Revised Permit Sections
01494-441	03/03/10	Additional crew boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1
01494-451	09/20/10	Added Wells / Revised Well List	• Signature Cover Page • Permit Revisions Table • Oil Well List (Section 5) • Attachment PO1494PC1 (Section 8)
01494-461	04/06/11	Administrative Amendment to change the Responsible Official	• Signature Cover Page • Permit Revisions Table
01494-471	09/28/11	Replaced One Well / Revised Ammonia Injection Rates / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Oil Well List • Attachment 74.23N2/1494 • Attachment PO14194PC1
01494-491	11/29/12	Utilize 3 Existing Crew Boat Engines as both Crew Boat Engines and Work Boat Engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1494PC1
01494-481 01494-501		01494-481: Replaced Wells 01494-501: Permit Reissuance for Period Terminating 12/31/17	See "Permit Summary and Statement of Basis"

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1. b. PERMIT SUMMARY AND STATEMENT OF BASIS

Stationary Source Description

This stationary source is an oil platform, Platform Gail, located offshore of Ventura, California. The platform is located in the Outer Continental Shelf (OCS) Area which is the offshore waters between three (3) and twenty-five (25) miles out from the coastline. The platform has been designated to the VCAPCD as the corresponding onshore area by the U.S. EPA. The source is a crude oil production facility and has a Standard Industrial Classification (SIC) Code of 1311, Crude Oil Production. The source operates various oil production and processing equipment, including wells, tanks, a glycol dehydrator system, flares, three 4.0 MW Allison turbines and diesel engines. The three 4.0 MW Allison turbines provide electrical power for the platform. The engines on the platform are used to start the turbines, for the operation of cranes, and for backup electrical power. This stationary source is subject to the Part 70 permit program based upon the potential to emit reactive organic compounds (ROC), nitrogen oxides (NOx), and carbon monoxide (CO).

As discussed in more detail throughout this Permit Summary and Statement of Basis, this permit applies to emissions units that are required to have a permit to operate pursuant to District Rule 10, "Permits Required", and District Rule 23, "Exemptions from Permit". These emissions units are listed in Table No. 2 in Section No. 2 of this permit. However, as discussed below, some equipment that is exempt from permit pursuant to District Rule 23, "Exemptions from Permit", may be subject to District rules such as District Rule 50, "Opacity". This includes "Insignificant Activities" as listed in Section No. 6 of the permit. In addition, "Short Term Activities" as listed in Section No. 10 of the permit are subject to certain rules and regulations. This permit does not shield the permittee from complying with any Federal, State, or District rule or regulation that is not specifically addressed in the permit or any rule or regulation that may come into effect during the term of the permit.

Stationary Source Emissions

In Ventura County, the Part 70 permit thresholds are 50 tons per year for ROC and NOx and 100 tons per year for PM, SOx, and CO, pursuant to Rule 33.B.2. Ventura County's nonattainment classification with the federal ozone standard has been in transition and is currently set at "Serious". This stationary source is subject to the Part 70 permit program based upon the potential to emit nitrogen oxides (NOx) and carbon monoxide (CO) in excess of these thresholds as shown in Table No. 4 in Section No. 4 of this Permit to Operate. The purpose of Table No. 4 is to document the permitted emissions of the criteria pollutants ROC, NOx, PM, SOx, and CO for this stationary source. District Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. District Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Criteria pollutant emissions (ROC, NOx, PM, SOx, and CO) result from the combustion of diesel fuel, natural gas, and produced gas in the turbines, engines, and flares. Criteria pollutants are also emitted from the diesel and gasoline engines associated with the crew boats, work boats, and boom boats. Reactive Organic Compound (ROC) emissions result from the storage and handling of crude oil and produced water in the tanks.

This stationary source is not a major source of federal Hazardous Air Pollutants (HAPs). The source is well below the HAP major source levels of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. Most Maximum Achievable Control Technology (MACT) standards only apply to major sources of hazardous air pollutants. As an Area (non-major) Source of hazardous air pollutants, there is one MACT that is applicable to this facility: "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT – 40 CFR Part 63, Subpart ZZZZ). The Part 70 Permit re-issuance application includes a summary of HAPs emissions (in the units of pounds per year). The purpose of the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (California Health and Safety Code Section 44300) is to collect air toxics emission data, to identify facilities having localized adverse health impacts, to ascertain health risks, to notify nearby workers and residents of significant risks, and to reduce significant risks if they exist. Platform Gail has not been subject to the State of California AB2588 Air Toxics "Hot Spot" Program because of its remote location.

The United States EPA has added greenhouse gases (GHGs) to the list of regulated air pollutants. As of January 2, 2011, EPA has required that GHGs be calculated for each Title V stationary source and included in the Part 70 Permit. EPA has "tailored" the regulations to include GHGs, such that the Title V applicability for the stationary source based on GHGs alone is emissions of 100,000 tons per year of CO_2 equivalent emissions (CO_{2e}). Greenhouse gases are defined as the aggregate group of six greenhouse gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons (by category), perfluorocarbons (by category), and sulfur hexafluoride. CO_{2e} is the amount of greenhouse gases emitted relative to the global warming potential of each pollutant. The CO_{2e} potential to emit for this stationary source has been calculated to be 88,165 tons per year. This potential to emit is based on the permitted annual combustion and operational (hours per year) limits listed in Table No. 3 of the permit. The District has used emission factors of 10.14 kg CO_{2e}/gallon diesel (22.33 lb CO_{2e}/gallon diesel) and 53.02 kg CO_{2e}/MMBTU natural gas (116.78 lb CO_{2e}/MMBTU natural gas) from the *Regulation For The Mandatory Reporting of Greenhouse Gas Emissions*, California Code of Regulations, title 17, Subchapter 10, Article 2, sections 95100 to 95133; Appendix A, Table 4. This CO2e potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, "Exemptions From Permit".

Compliance History

Upon submittal of the reissuance application for this Part 70 permit, the facility was determined to be in compliance with all applicable requirements. The facility is currently in compliance with the Part 70 Permit as reissued. The permit includes requirements for the RICE MACT (40 CFR Part 63 Subpart ZZZZ) which has a future effective date of May 3, 2013. For the time period

January 1, 1996 to January 3, 2013, the facility received forty (40) Notices of Violation (NOV) as detailed in the "NOV by Facility" history for Facility No. 01494 located at the end of this section of the Part 70 permit. For the time period January 1, 1996 to January 3, 2013, the facility received twelve (12) Notices to Comply (NTC) as detailed in the "NTC by Facility" history for Facility No. 01494 located at the end of this section of the Part 70 permit.

Equipment Description and Applicable Requirements - General

Applicable requirements for this stationary source are listed throughout the permit. The Table of Contents in the front of the permit summarizes the applicable requirements including the equipment specific requirements, the general applicable requirements, and the applicable requirements for short-term activities. Table No. 2 in Section No. 2 of this Permit to Operate details the applicable requirements for specific emissions units at the facility. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions". A detailed applicability discussion and additional legal basis for the permit condition(s) is included with each attachment or set of permit conditions.

Equipment Description and Applicable Requirements - Specific

The tanks at this facility are subject to Rule 71.1, "Crude Oil Production and Separation". The tanks are equipped with vapor recovery for Rule 71.1 compliance. The glycol dehydrator is operated in compliance with Rule 71.5, "Glycol Dehydrators".

Rule 74.9, "Stationary Internal Combustion Engines", exempts diesel engines used to power cranes from the provisions of the rule. The backup diesel engine and the turbine starter diesel engines are exempt from Rule 74.9 because each unit has a permitted annual diesel fuel limit that is less than 15 percent of the annual capacity for the unit. Therefore, the diesel engines on the platform are not required to meet the emission limits of Rule 74.9. The California Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines exempts engines operated solely on the OCS platforms from the operating requirements and emission standards of the rule. The diesel engines on the platform are required to comply with the "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT). There are engines at the stationary source in three different categories of the RICE MACT: (1) Emergency diesel engines; (2) Diesel engines $\leq$ 300 HP; and (3) diesel engines > 500 HP. The effective date of the RICE MACT is May 3, 2013.

The three Allison turbines are equipped with water injection and Selective Catalytic Reduction (SCR) for NOx control. The units are required to meet a Best Available Control Technology (BACT) NOx emission limit of 2.5 ppmvd at 15% oxygen while burning natural gas. This emission limit is more stringent than Rule 74.23, "Stationary Gas Turbines", and 40 CFR Part 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines". This BACT standard was established with Authority to Construct No. 01494-370 (issued May 16, 2006). The turbines are subject to monitoring requirements of Rule 74.23 and 40 CFR Part 64, "Compliance Assurance Monitoring". The turbines are not subject to 40 CFR Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines", and 40 CFR Part 63, Subpart YYYY, "National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines". Permit shields are included in the Part 70 Permit for the NSPS standard (Part 60, Subpart KKKK) and the MACT standard (Part 63, Subpart YYYY).

This stationary source is subject to the fugitive leak and inspection requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

The oil platform is located in the Outer Continental Shelf; and therefore, is subject to 40 CFR Part 55, "Outer Continental Shelf Air Regulations". 40 CFR Part 55 includes the District rules by reference, thereby making them federally enforceable. The versions of the rules referenced in 40 CFR Part 55 are included in the rule attachments of this permit if an OCS version is not the most recent version of a rule or not the otherwise federally enforceable version of a rule. 40 CFR Part 55 does not provide the authority to control the emissions from the vessels that service the platform, but does require that the vessel emissions be included in the permitted emissions for the OCS source. Therefore the engines on the workboats, crewboats, and boom boat servicing the platform and the permitted emissions for the engines are included in the Part 70 permit.

As stated above, the three turbines are subject to 40 CFR Part 64, "Compliance Assurance Monitoring." The units are subject to CAM for NOx because they have a NOx emission limit that is achieved by use of a control device (water injection and SCR) and the uncontrolled NOx emissions would exceed 25 tons per year NOx. The CAM requirements are that the water injection and ammonia injection rates are monitored and the NOx emission concentration at the stack is measured on a daily basis with a portable analyzer. No other emissions units at this stationary source are required to meet CAM requirements. The tank vapor recovery systems do not meet the CAM definition of a control device and the engines are not equipped with control devices.

This stationary source has stated that 40 CFR Part 68, "Chemical Accident Prevention Provisions", is not an applicable requirement. Therefore, a federal Risk Management Plan, pursuant to section 112(r) of the federal Clean Air Act as amended, is not required.

Permit Revisions Summary

The Permit Revisions Table (located in Section No. 1 of the permit) is a list of all permit revisions since Part 70 Permit No. 01494 was initially issued on January 1, 1998. A portion of

the permit revisions are described in further detail below. The District's Engineering Analysis for each application can also be consulted for further details.

Application No. 01494-311: Application No. 01494-311 is for the reissuance of Part 70 Permit No. 01494 for the period January 1, 2003 to December 31, 2007. The following items summarize the changes from the initial Part 70 Permit No. 01494 (January 1, 1998 to December 31, 2002):

- This "Stationary Source Description" has been added to the permit. It was not included in the initial Part 70 Permit No. 01494.
- Section No. 6, "Exempt Equipment List", has been revised. The permit identifies some of the emissions units as exempt pursuant to Rule 23, but not as "insignificant activities" pursuant to Rule 33.1.10.
- An attachment detailing the requirements of Rule 74.9, "Stationary Internal Combustion Engines", that apply to emergency standby stationary internal combustion engines rated at 50 or more horsepower and operated during an emergency or maintenance operation has been added to the permit. Rule 23.D.7 exempts these units from permit requirements. These units have been specifically listed in the Insignificant Activities Table and now are also generally listed in Tables 2, 3, and 4 of the permit.
- 40 CFR Part 64, "Compliance Assurance Monitoring", requirements for the Allison turbines have been included in the permit.
- An attachment detailing the applicable requirements for Rule 74.11.1, "Large Water Heaters and Small Boilers", has been added to the permit.
- The modifications to the Oil Well List pursuant to Minor Part 70 Permit Modification Application No. 01494-251 are included in this permit.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the initial issuance of Part 70 Permit No. 01494:
  a) Rule 54, "Sulfur Compounds"
  b) Rule 57, "Combustion Contaminants – Specific"
  c) Rule 64, "Sulfur Content of Fuels"
  d) Rule 68, "Carbon Monoxide"
  e) Rule 74.1, "Abrasive Blasting"
  f) Rule 74.2, "Architectural Coatings"
  g) Rule 74.6, "Surface Cleaning and Degreasing"
  h) Rule 74.9, "Stationary Internal Combustion Engines"
  i) Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
  j) Rule 74.16, "Oilfield Drilling Operations"
  k) Rule 74.23, "Stationary Gas Turbines"

Application Nos. 01494-372 and 01494-421: Application No. 01494-421 is for the reissuance of Part 70 Permit No. 01494 for the period terminating December 31, 2012. Application No. 01494-372 is for the permitting of Turbine G-1 with Selective Catalytic Reduction (SCR)

pursuant to Authority to Construct No. 01494-370. The following items summarize the changes due to this reissuance application:

- Tables 2, 3, and 4 and Permit Attachments 74.23N2/1494 and PO1494PC4 include revisions for Application No. 01494-372.
- The wipecleaning operation has been removed from the permit due to changes in Rule 23, "Exemptions From Permit". There is a reduction in the permitted emissions as a result of removing the wipecleaning operation from the permitted emissions table. Rule 74.6, "Surface Cleaning and Degreasing", will remain part of the permit in the "General Requirements" section.
- Revisions have been made to the Insignificant Activities Table.
- Revisions have been made to Attachment 74.16 which lists the requirements of Rule 74.16, "Oilfield Drilling Operations". The permitting status of associated equipment has been clarified.
- Applicability status to the federal MACT standards for the turbines has been clarified and permit shields for 40 CFR Part 60, Subpart KKKK and 40 CFR Part 63, Subpart YYYY have been included.
- The permit attachment for the California ATCM for Stationary Compression Ignition (CI) Engines requirements has been updated to reflect the 10/18/07 revisions to the regulation.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the January 1, 2003 to December 31, 2007 reissuance:
  a) Rule 23, "Exemptions From Permit"
  b) Rule 50, "Opacity"
  c) Rule 52, "Particulate Matter – Concentration (Grain Loading)" (No longer applicable)
  d) Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
  e) Rule 74.2, "Architectural Coatings"

Application Nos. 01494-301 and 01494-373: Application No. 01494-301 is for the permitting of modifications to the Oil Well List pursuant to Authority to Construct No. 01494-300 (issued June 10, 2002) and some additional Oil Well List changes that were not included in the Authority to Construct. Application No. 01494-373 is for the permitting of Turbines G-2 and G-3 with Selective Catalytic Reduction (SCR) pursuant to Authority to Construct No. 01494-370 (issued May 16, 2006).

Application Nos. 01494-481 and 01494-501: Application No. 01494-501 is for the reissuance of Part 70 Permit No. 01494 for the period terminating December 31, 2017. Application No. 01494-481 is for the replacement of two wells on the oil well list pursuant to Authority to Construct No. 01494-480. The following items summarize the changes due to this reissuance application:

- A discussion of Greenhouse Gases (GHGs) has been included in the Permit Summary and Statement of Basis.

- The permit attachment for the California ATCM for Stationary Compression Ignition (CI) Engines requirements has been updated to reflect the 05/19/11 revisions to the regulation.
- Permit attachments have been added to the permit for the "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT).
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the reissuance for the permit terminating December 31, 2012:
  a) Rule 74.2, "Architectural Coatings"
  b) Rule 74.9, "Stationary Internal Combustion Engines"
  c) Rule 74.11.1, "Large Water Heaters and Small Boilers"

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NOV by Facility

Since January 1, 1996

Facility No 01494 Platform Gail

NOV Date	NOV No	Rule Number	Comment	Settlement	Date Closed
02/26/1996	017448	29.C	Permit Condition Not Met rule 29.C - Turbine. Paid 11,600.00	$11,600.00	05/17/1996
02/26/1996	017449	29.C	Permit Condition Not Met Rule 29.C- Turbine. Paid $11,600.00	$11,600.00	05/17/1996
02/26/1996	017450	29.C	Permit Condition Not Met Rule 29.C - Turbine. Paid $11,600.00	$11,600.00	05/17/1996
03/27/1996	018250	29.C	Violation rule 29.C Permit cond.-Turbine. Paid $11,600.00	$11,600.00	05/17/1996
03/27/1996	018251	29.C	Violation rule 29.C permit cond. -Turbine. Paid $11,600.00	$11,600.00	05/17/1996
03/27/1996	018252	29.C	Violation rule 29.C pemit cond. - Turbine. Paid $11,600.00	$11,600.00	05/17/1996
03/27/1996	018253	103.A	Violation rule 103.A Missing Data - Turbine. Paid 11,600.00	$11,600.00	05/17/1996
03/27/1996	018254	32	Vilation rule 32 Breakdown Info. - Turbine. Paid $800.00	$800.00	05/17/1996
10/16/1996	018407	29.C	Rule 29.C Permit condition not met. Paid 6900.00	$6,900.00	11/04/1996
04/21/1997	018278	29.C	Permit Condition Not Met - Water Ratio Viol. 29.C. Paid $500.00	$500.00	06/02/1997
02/17/2000	018987	29.C	Permit Condition Not Met - Turbine Water Injection	$2,000.00	03/20/2000
02/28/2000	019148	71.1.B.1	Improper Vapor Recovery System - Water Deck/Waste Water Tanks	$5,000.00	04/17/2000
03/27/2000	018988	29.C	Permit Condition Not Met - Reduced Water Injection Ratio	$1,200.00	05/01/2000

04/04/2000	019401	71.1.B.1	Improper Vapor Recovery System - Deck & Waste Water Tanks	$0.00	05/02/2000
05/03/2001	019523	74.23.B.1	Inadequate Water To Fuel Ratio - Turbine	$1,000.00	06/05/2001
12/05/2001	019534	74.23.B.1	Inadequate Water to Fuel Ratio - Turbine	$5,000.00	02/01/2002
03/26/2003	020149	29.C	Permit Conditions Not Met - Failure To Conduct Opacity Survey	$1,000.00	05/02/2003
03/23/2004	020190	29.C	Permit Condition Not Met - Failure To Analyze Sulfur Content	$1,000.00	06/01/2004
06/27/2005	020730	74.23.B.2	Failure To Record NOx Emissions - Gas Turbine	$5,000.00	08/17/2005
07/28/2005	021113	74.6	Solvent Requirements - Solvent Cleaning	$5,000.00	10/19/2005
08/25/2005	020733	74.23.B.2	Failure To Record NOx Emissions - Gas Turbine	$10,000.00	09/29/2005
08/25/2005	020734	74.23.B.2	Failure To Record NOx Emissions - Gas Turbine	$10,000.00	09/29/2005
08/25/2005	020735	74.23.B.2	Failure To Record NOx Emissions - Gas Turbine	$5,000.00	09/29/2005
01/17/2006	020740	74.23.B.1	Failure To inject water - Gas Turbine	$10,000.00	09/20/2006
01/17/2006	020741	74.23.B.1	Failure To inject water - Gas Turbine	$10,000.00	09/20/2006
03/08/2006	021132	29.C	Permit Condition Not Met - Throughput Limits	$10,000.00	06/30/2006
07/24/2007	021587	54.B.1.b	Excess Sulfur Emissions - Flare	$5,000.00	08/31/2007
11/29/2007	021594	74.23.D	Failure To Record Data - Turbine	$10,000.00	01/11/2008
04/16/2008	021911	71.1.B.1.a	Improper Vapor Recovery System - Vapor Recovery System	$10,000.00	05/29/2008
09/11/2008	022017	74.23.B.2	Failure To Record Data - Gas Turbine	$5,000.00	10/09/2008
06/02/2009	022025	29.C	Permit Condition Not Met - Water Injection Rate	$10,000.00	07/21/2009
06/02/2009	022026	29.C	Permit Condition Not Met - SCR Temperature	$10,000.00	07/21/2009
07/27/2009	022030	74.23.B.2	Failing To Ammonia Injection-turbine	$10,000.00	08/27/2009
11/24/2009	022035	74.23.B.2	Failing to inject adequate Ammonia-Gas Torbine	$5,000.00	12/18/2009

06/09/2010	022651	74.10	Open Hatch On Tank - Tank Hatch	$10,000.00	07/15/2010
01/06/2011	022614	74.23.B.4	Exceeded Ammmonia Emissions - Gas Turbine AFS Key 00225 - 3 Violations 22614, 22615, 22616	$5,000.00	05/03/2011
01/06/2011	022615	74.23.B.4	Exceeded Ammonia Emissions - Gas Turbine AFS Key 00225 - 3 Violations 22614, 22615, 22616	$5,000.00	05/03/2011
01/06/2011	022616	74.23.B.4	Exceeded Ammonia Emissions - Gas Turbine AFS Key 00225 - 3 Violations 22614, 22615, 22616	$5,000.00	05/03/2011
05/31/2011	022676	10.A	Operating Without A Permit - Oilfield AFS Key ???	$3,000.00	07/19/2011
05/10/2012	022736	29.C	Permit Condition Not Met - Oilfield	$3,000.00	07/02/2012
Total for 40 NOVs				$266,600.00	

NTC by Facility

Since January 1, 1996

Facility No 01494 Platform Gail

NTC Date	NTC No	Rule Number	Comment	Date Closed
03/26/2001	C10522	29.C		05/23/2001
10/21/2002	C10749	29.C	Received source test report for turbines on 10/8/02.	10/21/2002
03/23/2004	C10828	29.C	Required information submitted. Please see Title V file For details. Facility IN COMPLIANCE.	05/04/2004
06/29/2005	C11207	10.A,.B	Application received 09/06/05 - Receipt #59835. Facility IN COMPLIANCE.	09/14/2005
03/13/2006	C11302	29.C	Revised TVPF-46 form(s) submitted as required. Facility IN COMPLIANCE.	05/12/2006
06/05/2006	C11227	10.A,B	Application submitted on 06/20/06 as required (Receipt #61972). Facility IN COMPLIANCE.	06/23/2006
04/25/2007	C11239	74.10	Per letter rec'd today from Mr. Pat Corcoran, Venoco Incorporated, equipment repaired/replaced as required. Facility IN COMPLIANCE.	05/11/2007
04/16/2008	C11754	74.10	Equipment repaired/replaced as required - see attached documentation dated April 30, 2008 from Mr. Pat Corcoran, Environmental Coordinator, Venoco Incorporated. Facility IN COMPLIANCE.	05/09/2008
12/18/2008	C11826	74.23.B.1	Failed to submit source test report within 45 days. Received source test report on 12/23/08.	12/23/2008

06/09/2010	C11793	74.10	Per re-inspection conducted 06/24/10, equipment repaired/replaced to leak-free condition as required. Facility IN COMPLIANCE.	06/24/2010
12/07/2010	C12075	29.C	Failed to submit source test report within 45 days.	12/21/2010
05/26/2011	C11492	74.10		06/01/2011

1.c. PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a "stand alone" monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.c.1. - Specific Applicable Requirements
- Table 1.c.2. - Permit-Specific Conditions
- Table 1.c.3. - General Applicable Requirements
- Table 1.c.4. - General Requirements for Short-Term Activities

1.c.1. Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1N1	Rules 71.1.B.1.a, 74.10	•Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable •Verbal notice of maintenance activities •Rule 74.10 inspections •Annual compliance certification including verification that tanks are equipped with a vapor recovery system	•Records of quarterly inspections and tank maintenance activities •Rule 74.10 records	None	None	
71.1N6	Rules 71.1.B.3, 71.1.D.1.c, 74.10	•Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve •Rule 74.10 inspections	•Records of number of days the tank has stored or held crude oil during the maintenance operation, location of the tank relative to a tank battery, and whether tank was connected to vapor recovery •Records to show integrity of roof and PV valves for tanks not permanently located at facility •Rule 74.10 records	None	None	
71.5N1	Rules 71.5.B.1.a.1, 71.5.B.2, 71.5.B.3, 71, 71.1, and 74.10	•Rule 74.10 inspections •Annual compliance certification including visual inspection to ensure system is closed and leak free	•Records of visual inspections •Records of current glycol dehydrator information •Rule 74.10 records	None	None	Gas Leak - EPA Method 21, Appendix A

1.c.1. Specific Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods
74.9N7	Rule 74.9.D.3	•Annual compliance certification •Hours of operation	•Records of operating hours •Date, time, duration, and reason for emergency operation •Records of engine data	None	None
74.9N8	Rule 74.9.D.8	•Annual compliance certification including engine's usage (fuel consumption or operating hours)	•Records of engine data including maximum hourly fuel consumption, actual annual usage, engine manufacturer, model number, operator ID number, and engine location	•Report of hours of operation or fuel usage	
74.9N9	Rule 74.9.D.9	•Annual compliance certification •Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only	•Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location	None	None
74.23N2/1494	Rules 26 (BACT); 74.23.B.1, 74.23.B.2.a and b, and 74.23.B.4 40 CFR Part 64 (CAM)	•Annual source test (NOx, O2, fuel HHV) •ADGS to continuously monitor type and amount fuel consumed at all loads, and at loads less than 1000 KW; water to fuel ratio; elapsed operation time; and turbine inlet temperature, urea injection rate (Turbine G-1), and SCR inlet temperature (Turbine G-1) •Annual compliance certification including actual annual fuel consumption and annual source tests	•Records of ADGS data •Records of water to fuel ratio •Fuel type and fuel consumption •Fuel type and consumption at < 1000 KW •Elapsed operation time •Turbine inlet temperature •Urea injection rate (Turbine G-1) •SCR inlet temp (Turbine G-1) •Number, duration, and cause of excursions, and corrective action taken (CAM) •Annual source test reports	•Report of fuel usage •Annual source test report •Number, duration, and cause of excursions, and corrective action taken (CAM)	•NO_x - EPA Method 20 •O2 - ARB Method 100 •Fuel Oil HHV – ASTM Method D240-87 •Gaseous fuel HHV – ASTM Method D1826-88
NSPS GG	40 CFR Part 60 Subparts A and GG	•Continuous monitors for fuel consumption and water to fuel ratio •Sulfur content of gaseous fuel semi-annually •Sulfur content of liquid fuels after each fuel transfer to storage tank from any other source •Monitor periods of excess emissions, startup, shutdown, operation malfunction, control equipment malfunction, or monitoring system/device malfunction •Source test (NOx, SOx, and O2) upon District request •Annual compliance certification	•Records of CEMs data and performance tests •Records of startup, shutdown, and malfunctions •Records of periods of excess emissions •Records of sulfur content of fuel •Records of firing emergency fuel	•Quarterly reports of excess emissions (any one-hour period), exceedances of sulfur content of fuel, firing of emergency fuel, monitoring systems performance, and/or emissions and monitoring summary	•Sulfur content of liquid fuels – ASTM Method D2880-71 •Sulfur content of gaseous fuels – ASTM D1072-80, D3031-81, D4084-82, or D3246-81 •NOx – EPA Method 20 •SOx – EPA Method 20 •O2 – EPA Method 20
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	•Fuel type records •Fuel use records	•Fuel type records •Fuel use records	None	None

1.c.1. Specific Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods
40CFR63ZZZZ3	RICE MACT for emergency diesel engines – oil change and inspections	•Maintenance records •Use of non-resettable hour meter •Annual compliance certification	•Maintenance records •Hours of operation records	None	None
40CFR63ZZZZ4	RICE MACT for non-emergency diesel ≤ 300 HP – oil change and inspections	•Maintenance records •Annual compliance certification	•Maintenance records	None	None
40CFR63ZZZZ6	RICE MACT for non-emergency diesel engines > 500 HP, CO ppm limit	•CO source testing or portable analyzer •CEMS or CPMS optional •Annual compliance certification	•CO testing records	As specified in Sections 63.6650(c)(1) – (6)	Portable analyzer, or EPA Methods 3, 4, and 10 or their designated alternatives

1.c.2. Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1494PC1 - Condition No. 1	Rules 29 General Recordkeeping	•Annual compliance certification •Monthly records of throughput and consumption	•Monthly records	None	None	
PO1494PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	•Annual compliance certification	None	None	None	
PO1494PC1 - Condition No. 3	Rule 26 Well Operations - BACT Requirements	•Annual compliance certification	None	None	None	
PO1494PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	•Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery •Annual compliance certification	Fuel records	None	None	
PO1494PC1 - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	•Diesel fuel consumption for boats servicing Platforms Grace and Gail •Monthly calculations of emissions (boats) •Annual compliance certification	•Monthly records of diesel fuel consumption •Monthly calculations of emissions (boats)	None	None	
PO1494PC1 – Condition No. 6	Rule 29 Crew Boats Shall Not Be Used Simultaneously	•Maintain a log book of hours and days of crew boat operation •Annual compliance certification	•Maintain a log book of hours and days of crew boat operation	None	None	
PO1494PC1 – Condition No. 7	Rule 29 Work Boats Shall Not Be Used Simultaneously	•Maintain a log book of hours and days of work boat operation •Annual compliance certification	•Maintain a log book of hours and days of work boat operation	None	None	
PO1494PC1 - Condition No. 8	Rule 29 Solvent Recordkeeping	•Monthly records of solvent purchase and usage •Annual compliance certification	•Monthly records of solvent purchase and usage	None	None	

1.c.2. Permit-Specific Conditions (Continued)

PO1494PC2 - Condition Nos. 1 and 4	Rule 29 Flare Fuel Consumption	•Flare gas consumption •Identify emergency vs. non-emergency usage •Annual compliance certification	•Monthly records of flare gas consumption	None	None	
PO1494PC2 - Condition Nos. 2 and 3	Rule 71.1 Flare Ignition System Operation	•Monthly tests of flare's ignition system •Annual compliance certification	•Records of ignition system tests and maintenance activities	None	None	
PO1494PC3	Rules 29 and 71.4 Drain Pit Operation	•Annual compliance certification	None	None	None	Function of the pit is to act as a containment berm
PO1494PC4	Rule 29 Backup Generator Operation	•Annual compliance certification	None	None	None	Should not be fired simultaneously with any of the three (3) turbines except during startup or shutdown

1.c.3. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	•Routine surveillance •Visual inspections •Annual compliance certification, including a formal survey •Opacity readings upon request •Notification required for uncorrectable visible emissions	•All occurrences of visible emissions for periods>3min in any one hour •Annual formal survey of all emissions units	None	•Opacity - EPA Method 9	
54.B.1 (OCS)	Rule 54.B.1	•Annual compliance certification •Identify planned vs. unplanned flaring event •Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event •Upon request, source test for sulfur compounds at point of discharge	•Representative fuel analysis or exhaust analysis and compliance demonstration •Flare records	None	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-94, as appropriate	
54.B.2 (OCS)	Rule 54.B.2	•Annual compliance certification •Identify planned vs. unplanned flaring event •Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event •Determine ground or sea level concentrations of SO_2, upon request	•Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration •Flare records	None	•SO_2 - BAAQMD Manual of Procedures, Vol.VI, Section 1, Ground Level Monitoring for H_2S and SO_2	
57.1	Rule 57.1	•Annual compliance certification	None	None	None	•Not required based on District analysis
64.B.1	Rule 64.B.1	•Annual compliance certification •None for PUC-quality gas •Annual test for non PUC-quality gas (submit with annual compliance certification)	•Annual fuel gas analysis for non PUC-quality gas	None	•SCAQMD Method 307-94	

1.c.3. General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
64.B.2	Rule 64.B.2	•Annual compliance certification •Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)	•Fuel supplier's certification, or fuel test per each delivery	None	•ASTM Method D4294-83 or D2622-87	
71.1.C	Rules 71.1.C and 74.10	•Annual compliance certification •Rule 74.10 inspections •Visual inspection to ensure collection system is closed •Quarterly inspection of flare to ensure proper operation	•Records of inspections of flare •Rule 74.10 records	None	None	•Compliance with Rule 74.10 ensures compliance with the gas collection system's maintenance requirements
71.4.B.1	Rule 71.4.B.1	•Annual compliance certification to ensure there are no first stage sumps	None	None	None	
71.4.B.3	Rule 71.4.B.3	•Annual compliance certification •Routine surveillance and visual inspections of well cellars	•Records of maintenance or well workover activity during periods of crude oil storage	None	None	
74.6	Rule 74.6	•Annual compliance certification •Maintain current solvent information •Routine surveillance of solvent cleaning activities •Upon request, solvent testing	•Records of current solvent information	None	•ROC content-EPA Test Method 24 or 24A •Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 •True vapor pressure or composite partial pressure -ASTM D2879-86 •Initial boiling point-ASTM 1078-78 or published source •Spray gun active/passive solvent losses-SCAQMD Method (10-3-89)	

1.c.3. General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.10	Rule 74.10	•Annual compliance certification •Identify leaking components •Inspections every shift or 8 hours at natural gas processing plants •Daily and/or weekly inspections for specified equipment •Quarterly inspections for specified components •Pressure relief valve inspections •Annual update to Operator Management Plan •Notification of major leaks in critical components •Notification of repeat leaks	•Records of leak inspections in inspection log	None	•Gas Leaks - EPA Method 21 •ROC Concentration of Gas Streams - ASTM E168-88, ASTM E169-87, or ASTM E260-85 •Weight percentage of evaporated compounds of liquids – ASTM Method D 86-82 •API Gravity - ASTM Method D287	
74.11.1	Rule 74.11.1	•Annual compliance certification •Maintain identification records of large water heaters and small boilers	•Records of current information of large water heaters and small boilers	None	None	•Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	•Annual compliance certification •Maintain furnace identification records	•Records of current furnace information	None	None	•Rule only applies to future installation of natural gas-fired, fan-type furnaces

1.c.4. General Requirements for Short-Term Activities

The General Requirements for Short-Term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 10 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	•Annual compliance certification •Routine surveillance and visual inspections of abrasive blasting operation •Abrasive blasting records	•Abrasive blasting records	None	•Visible emission evaluation-Section 92400 of CCR	
74.2	Rule 74.2	•Annual compliance certification •Routine surveillance •Maintain VOC records of coatings used	•Maintain VOC records of coatings used	None	•VOC content-EPA Method 24, CARB Method 432 • Acid content-ASTM Method D 1613-85, •Metal content-SCAQMD Method 311-91	
74.16N1494	Rule 74.16	•Annual compliance certification to ensure electric power drilling, and/or drilling engine has valid APCD Permit to Operate and meets NOx limit •Annual source tests (NOx) or engine manufacturer certification	•Records of source tests or engine manufacturer certification	None	•NO_x-ARB Method 100	
40CFR.61.M	40 CFR Part 60, Subpart M	•Annual compliance certification •See 40 CFR Part 61.145 for inspection procedures	•See 40 CFR Part 61.145 for recordkeeping procedures	•See 40 CFR Part 61.145 for notification procedures	•See 40 CFR Part 61.145 for test methods	

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2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements," and Section No. 8, "Permit Specific Conditions," of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions".

Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 7, "Specific Applicable Requirements," that contains the associated permit conditions. For example, code key "1" under Rule 71.1 is associated with Attachment 71.1N1 in Section No. 7.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "Additional Requirements". A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. The "PC#" also

corresponds to the permit attachment in Section No. 8, "Permit Specific Conditions," that contains the permit specific requirements.

TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Part 70 Permit No. 01494
Permitted Equipment and Applicable Requirements

Equipment	71.1	71.5	74.9	74.23	40 CFR Part 64	NSPS GG	Engine ATCM	RICE MACT	Additional Requirements
OCS Platform Gail									
1 - 300 BBL Slop Tank (T-1) VR	1								
1 - 300 BBL Slop Tank (T-2) VR	1								
1 - 256 BBL Oily Water CPI Unit (M-03) VR	1								
1 - 200 BBL PWT (T-06) VR	1								
1 - 40 BBL Oil Skim Tank (T-22) VR	1								
1 - 50 BBL Hydrocyclone Surge Vessel (V-41) VR	1								
1 - 256 BBL Oily Water CPI Separator (M-14) VR	1								
1 - 256 BBL Oily Water CPI Separator (M-15) VR	1								
1 - 256 BBL Waste Water CPI Sump (M-02) VR	1								
1 - 225 BBL Dry Oil Surge LACT Tank (V-8) VR	1								
1 - 134 BBL De-sanding Vessel (V-44) VR	1								
1 - 85 BBL Sump Tank (T-3) VR	1								
1 - 51 BBL Production Drain Tank (V-42) VR	1								
1 - 51 BBL SulfurOx Degasser Tank (V-81) VR	1								
1 - 7 BBL Vapor Recovery Suction Scrubber (V-14) VR	1								
1 - 7.07 Sqft Deck Drain Pit (T-21) Containment Berm-Exempt									PC3
1 - Glycol Dehydrator System consisting of:									
1 - 0.5 MMBTU/Hr Glycol Reboiler Vent (H-04)VR		1							
1 - Glycol Surge Tank (V-34) VR		1							
1 - Glycol Contactor Pressure Vessel (V-18)		1							
1 - Glycol Flash Tank (V-19) VR		1							
1 - 1312.5 MMBTU/Hr High Pressure Flare									PC1,PC2
1 - 656.3 MMBTU/Hr Low Pressure Flare									PC1,PC2
1 - 4800 BHP (4.0 MW) Allison NG/Diesel Turbine Generator (501-KB5) (G-1) Equipped with water injection and SCR for NOx control				2/1494	X	X			PC1
1 - 4800 BHP (4.0 MW) Allison NG/Diesel Turbine Generator (501-KB5) (G-2) Equipped with water injection and SCR for NOx control				2/1494	X	X			PC1
1 - 4800 BHP (4.0 MW) Allison NG/Diesel Turbine Generator (501-KB5) (G-3) Equipped with water injection and SCR for NOx control				2/1494	X	X			PC1
1 - 1300 BHP (850 KW) Detroit Diesel Back-up Generator (G-04)			8				3	6	PC1, PC4
1 - 140 BHP Detroit Diesel (4-53) Turbine Starter Engine			8				3	4	PC1
1 - 140 BHP Detroit Diesel (4-53) Turbine Starter Engine			8				3	4	PC1
1 - 140 BHP Detroit Diesel (4-53) Turbine Starter Engine			8				3	4	PC1
1 - 545 BHP Diesel Engine (South Crane)			9				3	6	PC1
1 - 215 BHP Diesel Engine (North Crane)			9				3	4	PC1
1 - 481 BHP Caterpillar Diesel Emergency Standby Engine, Model 3408 DITA, Serial No. 67U10240, I.D. P-18, used for fire suppression			7				3	3	PC1
Boom Boat Engines (Boomer)									
2 - 200 BHP Diesel Main Engines (Volvo Penta)									PC1
Crew Boat Engines									
"Glenn C"									
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)									PC1
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)									PC1
"Doug C"									
3 - 535 BHP Diesel Main Engines (Detroit 6062)									PC1
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)									PC1
"Jackie C"									
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)									PC1
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)									PC1
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)									PC1
"Aces Wild"									
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)									PC1
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)									PC1
"Ryan T"									
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)									PC1
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)									PC1
"Robbie Tide"									
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)									PC1
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)									PC1
"Patrick"									
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)									PC1
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)									PC1
"Danny C"									
2 - 365 BHP Diesel Main Engines (Caterpillar 3406 C)									PC1
1 - 40 BHP Diesel Generator Engine (Isuzu 4JB1)									PC1
1 - 32 BHP Diesel Generator Engine (Northern Lights M20)									PC1
1 - 46 BHP Diesel Hydraulic Engine (Detroit 271)									PC1
"Ace High"									
2 - 650 BHP Diesel Main Engines (Detroit 12V92TI)									PC1
1 - 510 BHP Diesel Main Center Engine (Detroit 12V71TI)									PC1
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)									PC1
Work Boat Engines									
"San Miguel"									
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B DITA SCAC)									PC1

TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Part 70 Permit No. 01494
Permitted Equipment and Applicable Requirements

Equipment	71.1	71.5	74.9	74.23	40 CFR Part 64	NSPS GG	Engine ATCM	RICE MACT	Additional Requirements
2 - 247 BHP Diesel Generator Engines (Caterpillar 3306 DIT)									PC1
1 - 550 BHP Diesel Thruster Engine (Caterpillar 3408 DITA)									PC1
1 - 315 BHP Diesel Compressor Engine (Caterpillar 3306 DITA)									PC1
1 - 306 BHP Diesel Aux Pump Engine (Caterpillar 3406 DIT)									PC1
1 - 273 BHP Diesel Winch Engine (Detroit 8V-71)									PC1
"Victory Seahorse"									
2 - 2500 BHP Diesel Main Engines (EMD 16-645-ED3A)									PC1
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)									PC1
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)									PC1
"Santa Cruz"									
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B)									PC1
2 - 245 BHP Diesel Generator Engines (Caterpillar 3306)									PC1
1 - 515 BHP Diesel Thruster Engine (Caterpillar 3408)									PC1
"Toby Tide"									
2 - 1125 BHP Diesel Main Engines (Caterpillar D399TA)									PC1
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)									PC1
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)									PC1
"Sea Tide"									
2 - 1220 BHP Diesel Main Engines (DDEC 12V149TI)									PC1
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)									PC1
1 - 200 BHP Diesel Thruster Engine (Detroit 6V-71)									PC1
"Robin J"									
2 - 600 BHP Diesel Main Engines (GM 1692)									PC1
2 - 21 BHP Diesel Generator Engines (GM 471)									PC1
"O'Neil Tide"									
2 - 1125 BHP Diesel Main Engines (Caterpillar D399T/A)									PC1
2 - 243 BHP Diesel Generator Engines (Caterpillar 3306 DIT)									PC1
1 - 325 BHP Diesel Thruster Engine (Caterpillar 3406 DIT)									PC1
1 - 325 BHP Diesel Aux Fire Pump Engine (Caterpillar 3406 DIT)									PC1
2 - 243 BHP Diesel Aux Liquid Pump Engines (Caterpillar 3306 DIT)									PC1
"Jackie C"									
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)									PC1
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)									PC1
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)									PC1
"Patriot II"									
2 - 626 BHP Diesel Main Engines (Detroit 16V92)									PC1
2 - 103 BHP Diesel Generator Engines (Detroit 4-71)									PC1
1- 103 BHP Diesel Fire Water Pump Engine (Detroit 4-71)									PC1
"Kenneth Carl"									
2 - 626 BHP Diesel Main Engines (Detroit 16V92)									PC1
2 - 76 BHP Diesel Generator Engines (Detroit 3-71)									PC1
1- 103 BHP Diesel Fire Water Pump Engine (Detroit 4-71)									PC1
"Glenn C"									
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)									PC1
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)									PC1
"Doug C"									
3 - 535 BHP Diesel Main Engines (Detroit 6062)									PC1
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)									PC1
"Patrick"									
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)									PC1
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)									PC1
For Use Throughout Platform									
30 - Oil Wells									PC1
2 - 500 BBL Closed Top Portable Tanks	6								

M:\TITLEV\TV Permits\PO1494\Permit IV\[Tables_rev481,501.xlsx]Table 2

TITLE V EQUIPMENT LIST DESCRIPTION KEY

For Title V permits, the Permitted Equipment and Applicable Requirements Table contains a number of terms, abbreviations, and acronyms that have been standardized for oilfield facilities. The following list describes many of the terms on an oilfield equipment list:

BHP The output of an internal combustion engine as measured in brake horsepower.

BL A crude oil loading facility that is equipped with bottom loading capabilities.

Condensate Tank A tank that is used for the purpose of storing water and hydrocarbon liquids recovered from natural gas scrubbers. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

COST A crude oil storage tank that generally operates with a variable liquid level and has an associated throughput limit. An oil shipping tank that has a truck loading rack is a COST by definition. These tanks may also be known as shipping tanks.

Cover Indicates that a petroleum sump, pit, or pond is equipped with a properly installed and maintained cover which complies with Rule 71.4.

EXEMPT A tank, pit, or sump that processes produced water with an ROC content of less than 5 milligrams per liter and is exempt from Rule 71.1 or Rule 71.4.

Gauge or Test Tank A tank that is used for the purpose of production testing a well or group of wells. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

LACT Tank A Lease Automated Custody Transfer tank that operates at a constant or near constant liquid level and does not have an associated throughput limit. This tank is generally equipped with a LACT pump for pipeline oil shipping. A shipping tank with a truck loading rack is not by definition a LACT tank, but is a COST.

Loading Facility A crude oil loading rack or loading valve used for the transfer of crude oil from a storage tank or group of tanks to a delivery vessel.

Lo-NOx Device has equipment to control the emissions of NOx and CO to meet the requirements of Rules 74.15 or 74.15.1, or best available control technology requirements.

MMBTU/Hr The heat input of an external combustion device as measured in millions of British Thermal Units per hour.

NG Indicates that the equipment is permitted to be fired on natural gas only.

NG/FO Indicates that equipment is permitted to be fired on natural gas with fuel oil or diesel as a backup fuel.

NSCR Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.

Pit Device used to receive emergency or intermittent flows.

PSC Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.

PWT A produced water tank that generally operates with a constant liquid level and does not have an associated throughput limit. These tanks may also be known as free water knock out (FWKO) tanks.

Rich Burn or Lean Burn A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.

SCR Engine or turbine that is equipped with selective catalytic reduction and ammonia injection to meet its Rule 74.9 or Rule 74.23 compliance requirements.

SF A crude oil loading facility that is equipped with submerged fill loading capabilities.

Sump Device used for separation, generally in constant use.

UNC Indicates that the equipment is uncontrolled. For example, a tank that is not equipped with a vapor recovery system, or an engine or heater that is not equipped with NOx controls are labeled UNC.

VR A vapor recovery system that is installed on a tank, loading rack or loading facility, glycol dehydrator, or other piece of process equipment.

Wash Tank A tank that stores and separates oil and water that generally operates with a constant liquid level. It does not have an associated throughput limit.

TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 71.1, "Crude Oil Production and Separation"

1. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to a gas gathering system or flare (71.1.B.1.a)
2. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to some other control system with a minimum destruction or removal efficiency of 90% by weight (71.1.B.1.b)
3. Tank batteries installed prior to June 20, 1978 are exempt from vapor recovery when processing crude oil having a modified Reid vapor pressure of less than 0.5 psia. Solid roof and pressure-vacuum relief valve is required. (71.1.B.2/71.1.D.1.a)
4. Storage tanks are exempt from the solid roof and vapor recovery requirements if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. (71.1.D.3)
5. Storage tanks are exempt from the solid roof and vapor recovery requirements if a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.1.D.4)
6. Portable tanks shall be equipped with closed covers and pressure vacuum valves and have limited exemptions from vapor recovery requirements. (71.1.B.3/71.1.D.1.c)

Rule 71.5, "Glycol Dehydrators"

1. Requirement to have a condenser or separator system which directs vapors to a fuel gas or sales gas system. (71.5.B.1.a.1) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
2. Requirement to have a condenser or separator system which directs vapors to a flare, incinerator, thermal oxidizer or reboiler. (71.5.B.1.a.2) Operation requirements for flare or incinerator. (71.5.B.1.b) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
3. Requirement to have a condenser or separator system which directs vapors to another 95% control system. (71.5.B.1.a.3) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
4. Requirement to have any other control system with a 95% control efficiency or which meets an emission limit of 1.7 lb ROC per MMSCF of gas dehydrated. (71.5.B.1.c) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
5. Exemption from the control requirements of Rule 71.5 for unit that is operated less than 200 hours per year. (71.5.C)

Rule 74.9, "Stationary Internal Combustion Engines"

1. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas rich burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)

2. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas lean burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
3. Post-January 1, 1997 emission limits for natural gas rich burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2)
4. Post-January 1, 1997 emission limits for natural gas lean burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
5. Post-January 1, 1997 emission limits for diesel engines. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar year (74.9.D.2)
7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)
8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)

Rule 74.23, "Stationary Gas Turbines"

1. NOx and NH3 emission limit for turbines rated at 0.3 MW to less than 2.9 MW (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
2. NOx and NH3 emission limit for turbines rated at 2.9 MW to less than 10.0 MW. (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
3. NOx and NH3 emission limit for turbines rated at 10.0 MW and higher, with SCR, and operated less than 4,000 hr/yr (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
4. NOx and NH3 emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, with SCR, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, and 74.23.B.4)
5. NOx emission limit for turbines rated at 10.0 MW and higher, without SCR, and operated less than 4,000 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
6. NOx emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, without SCR, and operated more than 4,000 hr/yr (74.23.B.1 and 74.23.B.2)
7. NOx emission limit for turbines rated at 4.0 MW and higher, operated less than 877 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
8. Exemption from the requirements of 74.23.B, for turbines operated less than 200 hrs per calendar year (74.23.C.1.c)

9. Exemption from the requirements of 74.23.B, for emergency standby units operated during either an emergency or maintenance operation. (74.23.C.1.d)
10. Pre-April 30, 2001 NOx emission limit and CEMS requirement and post-April 30, 2001 NOx emission limit and CEMS requirement for turbines rated at over 20 MW, equipped with water injection only where exhaust gases are used to dry paper, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, 74.23.B.5, and 74.23.I.3)

Section 93115, Title 17, California Code of Regulations California Airborne Toxic Control Measure For Stationary Compression Ignition (CI) Engines

1. In-use emergency fire pump assembly engines
2. In-use emergency engines operated not more than 20 hours per year for maintenance and testing purposes.
3. Engines operated solely on OCS Platforms.

40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine (RICE MACT)

1. Existing compression ignition and spark ignition engine compliance dates
2. Existing landfill gas engines – area source
3. Existing emergency diesel engines – area source
4. Existing non-emergency diesel engines $\leq$ 300 HP – area source
5. Existing non-emergency diesel engines 300 HP $<$ X $\leq$ 500 HP – area source
6. Existing non-emergency diesel engines $<$ 500 HP – area source

3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits". Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 8, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits".

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable", a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits". Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit". When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput

column are left blank.

Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

The "Calculation Procedure" column is reserved for future use. Emission calculations for the emissions units in this table are available in the District's permit files for this stationary source.

Abbreviations

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year
Days/Yr: days per year
FO: fuel oil or diesel fuel
Gal/Yr: gallons per year
Hrs/Day: hours per day
Hrs/Yr: hours per year
Lbs ROC/Yr: pounds of reactive organic compounds per year
LPG: liquid petroleum gas (propane)
MBBL/Yr: thousands of barrels per year
MGal/Yr: thousands of gallons per year
MMBTU/Yr: million British Thermal Units of heat input per year
MMCF/Yr: million standard cubic feet of natural gas per year
MMGal/Yr: million gallons per year
NG: natural gas
TPY: tons per year

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Part 70 Permit No. 01494
Permitted Throughput/Consumption Limits

Equipment	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
OCS Platform Gail			
1 - 300 BBL Slop Tank (T-1) VR			
1 - 300 BBL Slop Tank (T-2) VR			
1 - 256 BBL Oily Water CPI Unit (M-03) VR			
1 - 200 BBL PWT (T-06) VR			
1 - 40 BBL Oil Skim Tank (T-22) VR			
1 - 50 BBL Hydrocyclone Surge Vessel (V-41) VR			
1 - 256 BBL Oily Water CPI Separator (M-14) VR			
1 - 256 BBL Oily Water CPI Separator (M-15) VR			
1 - 256 BBL Waste Water CPI Sump (M-02) VR			
1 - 225 BBL Dry Oil Surge LACT Tank (V-8) VR			
1 - 134 BBL De-sanding Vessel (V-44) VR			
1 - 85 BBL Sump Tank (T-3) VR			
1 - 51 BBL Production Drain Tank (V-42) VR			
1 - 51 BBL SulfurOx Degasser Tank (V-81) VR			
1 - 7 BBL Vapor Recovery Suction Scrubber (V-14) VR			
1 - 7.07 Sqft Deck Drain Pit (T-21) Containment Berm-Exempt			
1 - Glycol Dehydrator System consisting of:	No Limit		8760 hr/yr
1 - 0.5 MMBTU/Hr Glycol Reboiler Vent (H-04)VR			
1 - Glycol Surge Tank (V-34) VR			
1 - Glycol Contactor Pressure Vessel (V-18)			
1 - Glycol Flash Tank (V-19) VR			
1 - 1312.5 MMBTU/Hr High Pressure Flare	4.9 MMCF/Yr	F	4.9 MMCF/Yr
1 - 656.3 MMBTU/Hr Low Pressure Flare	2.31 MMCF/Yr	F	2.31 MMCF/Yr
1 - 4800 BHP (4.0 MW) Allison NG/Diesel Turbine Generator (501-KB5) (G-1)			
Equipped water injection and SCR for NOx control @ All Loads	1,325 MMCF/Yr & 335,000 Gal/Yr	F	1,316 MMCF/Yr & 185,000 Gal/Yr
@ < 1000 KW	9.0 MMCF/Yr & 150,000 Gal/Yr	F	9.0 MMCF/Yr & 150,000 Gal/Yr
1 - 4800 BHP (4.0 MW) Allison NG/Diesel Turbine Generator (501-KB5) (G-2)			
Equipped water injection and SCR for NOx control @ All Loads	*		*
@ < 1000 KW	**		**
1 - 4800 BHP (4.0 MW) Allison NG/Diesel Turbine Generator (501-KB5) (G-3)			
Equipped water injection and SCR for NOx control @ All Loads	*		*
@ < 1000 KW	**		**
1 - 1300 BHP (850 KW) Detroit Diesel Back-up Generator (G-04)	32,130 Gal/Yr	F	32,130 Gal/Yr
1 - 140 BHP Detroit Diesel (4-53) Turbine Starter Engine	960 Gal/Yr	F	960 Gal/Yr
1 - 140 BHP Detroit Diesel (4-53) Turbine Starter Engine	++		++
1 - 140 BHP Detroit Diesel (4-53) Turbine Starter Engine	++		++
1 - 545 BHP Diesel Engine (South Crane)	21,339 Gal/Yr	F	21,339 Gal/Yr
1 - 215 BHP Diesel Engine (North Crane)	++		++
1 - 481 BHP Caterpillar Diesel Emergency Standby Engine, Model 3408 DITA, Serial No. 67U10240, I.D. P-18, used for fire suppression	50 Hr/Yr [1]	D	50 Hr/Yr
Boom Boat (Boomer)			
2 - 200 BHP Diesel Main Engines (Volvo Penta)	1,406 Gal/Yr	F	1,406 Gal/Yr
Crew Boat Engines			
"Glenn C"			53.1 Mgal/Yr
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)			++
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)			++
ROC	2.77 TPY	F	
NOx	46.87 TPY	F	
PM	2.80 TPY	F	
SOx	0.63 TPY	F	
CO	8.52 TPY	F	
"Doug C"			
3 - 535 BHP Diesel Main Engines (Detroit 6062)	++		++
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)	++		++

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Part 70 Permit No. 01494
Permitted Throughput/Consumption Limits

Equipment	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
"Jackie C"			
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	++		++
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	++		++
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	++		++
"Aces Wild"			
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	++		++
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	++		++
"Ryan T"			
4 - 510 BHP Diesel Main Engines (Detroit, 12V71TI)	++		++
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	++		++
"Robbie Tide"			
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	++		++
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	++		++
"Patrick"			
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	++		++
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	++		++
"Danny C"			
2 - 365 BHP Diesel Main Engines (Caterpillar 3406 C)	++		++
1 - 40 BHP Diesel Generator Engine (Isuzu 4JB1)	++		++
1 - 32 BHP Diesel Generator Engine (Northern Lights M20)	++		++
1 - 46 BHP Diesel Hydraulic Engine (Detroit 271)	++		++
"Ace High"			
2 - 650 BHP Diesel Main Engines (Detroit 12V92TI)	++		++
1 - 510 BHP Diesel Main Center Engine (Detroit 12V71TI)	++		++
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	++		++
Work Boat Engines			
"San Miguel"			
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B DITA SCAC)	++		114,000 Gal/yr
2 - 247 BHP Diesel Generator Engines (Caterpillar 3306 DIT)	++		++
1 - 550 BHP Diesel Thruster Engine (Caterpillar 3408 DITA)	++		++
1 - 315 BHP Diesel Compressor Engine (Caterpillar 3306 DITA)	++		++
1 - 306 BHP Diesel Aux Pump Engine (Caterpillar 3406 DIT)	++		++
1 - 273 BHP Diesel Winch Engine (Detroit 8V-71)	++		++
"Victory Seahorse"			
2 - 2500 BHP Diesel Main Engines (EMD 16-645-ED3A)	++		++
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	++		++
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)	++		++
"Santa Cruz"			
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B)	++		++
2 - 245 BHP Diesel Generator Engines (Caterpillar 3306)	++		++
1 - 515 BHP Diesel Thruster Engine (Caterpillar 3408)	++		++
"Toby Tide"			
2 - 1125 BHP Diesel Main Engines (Caterpillar D399TA)	++		++
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	++		++
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)	++		++
"Sea Tide"			
2 - 1220 BHP Diesel Main Engines (DDEC 12V149TI)	++		++
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	++		++
1 - 200 BHP Diesel Thruster Engine (Detroit 6V-71)	++		++

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Part 70 Permit No. 01494
Permitted Throughput/Consumption Limits

Equipment	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
"Robin J"			
2 - 600 BHP Diesel Main Engines (GM 1692)	++		++
2 - 21 BHP Diesel Generator Engines (GM 471)	++		++
"O'Neil Tide"			
2 - 1125 BHP Diesel Main Engines (Caterpillar D399T/A)	++		++
2 - 243 BHP Diesel Generator Engines (Caterpillar 3306 DIT)	++		++
1 - 325 BHP Diesel Thruster Engine (Caterpillar 3406 DIT)	++		++
1 - 325 BHP Diesel Aux Fire Pump Engine (Caterpillar 3406 DIT)	++		++
2 - 243 BHP Diesel Aux Liquid Pump Engines (Caterpillar 3306 DIT)	++		++
"Jackie C"			
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	++	F	++
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	++	F	++
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	++	F	++
"Patriot II"			
2 - 626 BHP Diesel Main Engines (Detroit 16V92)	++	F	++
2 - 103 BHP Diesel Generator Engines (Detroit 4-71)	++	F	++
1- 103 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	++	F	++
"Kenneth Carl"			
2 - 626 BHP Diesel Main Engines (Detroit 16V92)	++	F	++
2 - 76 BHP Diesel Generator Engines (Detroit 3-71)	++	F	++
1- 103 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	++	F	++
"Glenn C"			
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	++		++
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)	++		++
"Doug C"			
3 - 535 BHP Diesel Main Engines (Detroit 6062)	++		++
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)	++		++
"Patrick"			
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	++		++
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	++		++
For Use Throughout Platform			
30 - Oil Wells			
2 - 500 BBL Closed Top Portable Tanks			

Notes:
1 - 50 Hours per year is for maintenance purposes. Emergency use is unlimited.
* - Included in Above Limit for All Loads
** - Included in Above Limit for @ < 1000 KW
++ - Included in Limit Above

M:\TITLEV\TV Permits\PO1494\Permit IV\[Tables_rev481,501.xlsx]Table 3

4. PERMITTED EMISSIONS TABLE

Purpose

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. Rule 29 is federally enforceable on OCS Platforms, pursuant to 40 CFR Part 55, "Outer Continental Shelf Air Regulations".

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table", contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Tons Per Year

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since

October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

Hazardous Air Pollutants

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the reissuance application or the facility's AB-2588, Air Toxics "Hot Spots", Report referenced at the bottom of the "Permitted Emissions Table". For Outer Continental Source (OCS) sources, not subject to AB-2588, HAP emissions information is included in the permit reissuance application and is maintained by the stationary source.

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Part 70 Permit No. 01494
Permitted Emissions

Equipment	TONS PER YEAR						POUNDS PER HOUR					
	ROC	NOx	PM	SOx	CO	NH3	ROC	NOx	PM	SOx	CO	NH3
OCS Platform Gail												
1 - 300 BBL Slop Tank (T-1) VR	0.01						<0.01					
1 - 300 BBL Slop Tank (T-2) VR	0.01						<0.01					
1 - 256 BBL Oily Water CPI Unit (M-03) VR	0.01						<0.01					
1 - 200 BBL PWT (T-06) VR	<0.01						<0.01					
1 - 40 BBL Oil Skim Tank (T-22) VR	<0.01						<0.01					
1 - 50 BBL Hydrocyclone Surge Vessel (V-41) VR	<0.01						<0.01					
1 - 256 BBL Oily Water CPI Separator (M-14) VR	0.01						<0.01					
1 - 256 BBL Oily Water CPI Separator (M-15) VR	0.01						<0.01					
1 - 256 BBL Waste Water CPI Sump (M-02) VR	0.02						<0.01					
1 - 225 BBL Dry Oil Surge LACT Tank (V-8) VR	0.01						<0.01					
1 - 134 BBL De-sanding Vessel (V-44) VR	<0.01						<0.01					
1 - 85 BBL Sump Tank (T-3) VR	0.01						<0.01					
1 - 51 BBL Production Drain Tank (V-42) VR	<0.01						<0.01					
1 - 51 BBL SulfurOx Degasser Tank (V-81) VR	<0.01						<0.01					
1 - 7 BBL Vapor Recovery Suction Scrubber (V-14) VR	<0.01						<0.01					
1 - 7.07 Sqft Deck Drain Pit (T-21) Containment Berm-Exempt												
1 - Glycol Dehydrator System consisting of:	8.10						1.85					
1 - 0.5 MMBTU/Hr Glycol Reboiler Vent (H-04)VR												
1 - Glycol Surge Tank (V-34) VR												
1 - Glycol Contactor Pressure Vessel (V-18)												
1 - Glycol Flash Tank (V-19) VR												
1 - 1312.5 MMBTU/Hr High Pressure Flare	0.13	0.17	0.01	0.81	0.95		68.00	89.25	6.56	413.44	485.63	
1 - 656.3 MMBTU/Hr Low Pressure Flare	0.06	0.08	0.01	0.38	0.45		34.00	44.63	3.28	206.75	242.85	
1 - 4800 BHP (4.0 MW) Allison NG/Diesel Turbine Generator (501-KB5) (G-1) Equipped with water injection and SCR for NOx control	1.47	7.83	4.88	1.58	191.85	21.23	0.28	3.44	1.73	7.26	35.43	3.92
1 - 4800 BHP (4.0 MW) Allison NG/Diesel Turbine Generator (501-KB5) (G-2) Equipped with water injection and SCR for NOx control	*	*	*	*	*	*	*	*	*	*	*	*
1 - 4800 BHP (4.0 MW) Allison NG/Diesel Turbine Generator (501-KB5) (G-3) Equipped with water injection and SCR for NOx control	*	*	*	*	*	*	*	*	*	*	*	*
1 - 1300 BHP (850 KW) Detroit Diesel Back-up Generator (G-04)	**	**	**	**	**		2.51	35.46	2.53	0.57	7.71	
1 - 140 BHP Detroit Diesel (4-53) Turbine Starter Engine	0.02	0.23	0.02	<0.01	0.05		0.33	4.64	0.33	0.07	1.01	
1 - 140 BHP Detroit Diesel (4-53) Turbine Starter Engine	*	*	*	*	*		0.33	4.64	0.33	0.07	1.01	
1 - 140 BHP Detroit Diesel (4-53) Turbine Starter Engine	*	*	*	*	*		0.33	4.64	0.33	0.07	1.01	
1 - 545 BHP Diesel Engine (South Crane)	0.35	4.99	0.36	0.08	1.09		1.79	25.28	1.81	0.40	5.50	
1 - 215 BHP Diesel Engine (North Crane)	*	*	*	*	*		*	*	*	*	*	
1 - 481 BHP Caterpillar Diesel Emergency Standby Engine, Model 3408 DITA, Serial No. 67U10240, I.D. P-18, used for fire suppression	0.03	0.40	0.03	0.01	0.09		0.28	4.00	0.29	0.06	0.87	
Boom Boat (Boomer)												
2 - 200 BHP Diesel Main Engines (Volvo Penta)	0.02	0.33	0.02	0.01	0.07		0.94	13.32	0.95	0.21	2.90	
Crew Boat Engines												
"Glenn C"												
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	0.88	14.89	0.89	0.20	2.71		4.80	81.23	4.85	1.09	14.77	
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)	*	*	*	*	*		0.58	9.87	0.59	0.13	1.80	
"Doug C"												
3 - 535 BHP Diesel Main Engines (Detroit 6062)	*	*	*	*	*		*	*	*	*	*	
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)	*	*	*	*	*		*	*	*	*	*	
"Jackie C"												
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*		*	*	*	*	*	
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*		*	*	*	*	*	
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	*	*	*	*	*		*	*	*	*	*	
"Aces Wild"												
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*		*	*	*	*	*	
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*		*	*	*	*	*	
"Ryan T"												
4 - 510 BHP Diesel Main Engines (Detroit, 12V71TI)	*	*	*	*	*		*	*	*	*	*	
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*		*	*	*	*	*	
"Robbie Tide"												
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*		*	*	*	*	*	
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*		*	*	*	*	*	

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Part 70 Permit No. 01494
Permitted Emissions

Equipment	TONS PER YEAR						POUNDS PER HOUR					
	ROC	NOx	PM	SOx	CO	NH3	ROC	NOx	PM	SOx	CO	NH3
"Patrick"												
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*		*	*	*	*	*	
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*		*	*	*	*	*	
"Danny C"												
2 - 365 BHP Diesel Main Engines (Caterpillar 3406 C)	*	*	*	*	*		*	*	*	*	*	
1 - 40 BHP Diesel Generator Engine (Isuzu 4JB1)	*	*	*	*	*		*	*	*	*	*	
1 - 32 BHP Diesel Generator Engine (Northern Lights M20)	*	*	*	*	*		*	*	*	*	*	
1 - 46 BHP Diesel Hydraulic Engine (Detroit 271)	*	*	*	*	*		*	*	*	*	*	
"Ace High"												
2 - 650 BHP Diesel Main Engines (Detroit 12V92TI)	*	*	*	*	*		*	*	*	*	*	
1 - 510 BHP Diesel Main Center Engine (Detroit 12V71TI)	*	*	*	*	*		*	*	*	*	*	
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*		*	*	*	*	*	
Work Boat Engines												
"San Miguel"												
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B DITA SCAC)	1.89	31.98	1.91	0.43	5.81		7.71	130.49	7.79	1.74	23.73	
2 - 247 BHP Diesel Generator Engines (Caterpillar 3306 DIT)	*	*	*	*	*		1.16	19.64	1.17	0.26	3.57	
1 - 550 BHP Diesel Thruster Engine (Caterpillar 3408 DITA)	*	*	*	*	*		1.29	21.88	1.31	0.29	3.98	
1 - 315 BHP Diesel Compressor Engine (Caterpillar 3306 DITA)	*	*	*	*	*		0.74	12.51	0.75	0.17	2.27	
1 - 306 BHP Diesel Aux Pump Engine (Caterpillar 3406 DIT)	*	*	*	*	*		0.72	12.17	0.73	0.16	2.21	
1 - 273 BHP Diesel Winch Engine (Detroit 8V-71)	*	*	*	*	*		0.64	10.88	0.65	0.15	1.98	
"Victory Seahorse"												
2 - 2500 BHP Diesel Main Engines (EMD 16-645ED3A)	*	*	*	*	*		*	*	*	*	*	
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	*	*	*	*	*		*	*	*	*	*	
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)	*	*	*	*	*		*	*	*	*	*	
"Santa Cruz"												
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B)	*	*	*	*	*		*	*	*	*	*	
2 - 245 BHP Diesel Generator Engines (Caterpillar 3306)	*	*	*	*	*		*	*	*	*	*	
1 - 515 BHP Diesel Thruster Engine (Caterpillar 3408)	*	*	*	*	*		*	*	*	*	*	
"Toby Tide"												
2 - 1125 BHP Diesel Main Engines (Caterpillar D399TA)	*	*	*	*	*		*	*	*	*	*	
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	*	*	*	*	*		*	*	*	*	*	
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)	*	*	*	*	*		*	*	*	*	*	
"Sea Tide"												
2 - 1220 BHP Diesel Main Engines (DDEC 12V149TI)	*	*	*	*	*		*	*	*	*	*	
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	*	*	*	*	*		*	*	*	*	*	
1 - 200 BHP Diesel Thruster Engine (Detroit 6V-71)	*	*	*	*	*		*	*	*	*	*	
"Robin J"												
2 - 600 BHP Diesel Main Engines (GM 1692)	*	*	*	*	*		*	*	*	*	*	
2 - 21 BHP Diesel Generator Engines (GM 471)	*	*	*	*	*		*	*	*	*	*	
"O'Neil Tide"												
2 - 1125 BHP Diesel Main Engines (Caterpillar D399T/A)	*	*	*	*	*		*	*	*	*	*	
2 - 243 BHP Diesel Generator Engines (Caterpillar 3306 DIT)	*	*	*	*	*		*	*	*	*	*	
1 - 325 BHP Diesel Thruster Engine (Caterpillar 3406 DIT)	*	*	*	*	*		*	*	*	*	*	
1 - 325 BHP Diesel Aux Fire Pump Engine (Caterpillar 3406 DIT)	*	*	*	*	*		*	*	*	*	*	
2 - 243 BHP Diesel Aux Liquid Pump Engines (Caterpillar 3306 DIT)	*	*	*	*	*		*	*	*	*	*	
"Jackie C"												
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*		*	*	*	*	*	
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*		*	*	*	*	*	
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	*	*	*	*	*		*	*	*	*	*	
"Patriot II"												
2 - 626 BHP Diesel Main Engines (Detroit 16V92)	*	*	*	*	*		*	*	*	*	*	
2 - 103 BHP Diesel Generator Engines (Detroit 4-71)	*	*	*	*	*		*	*	*	*	*	
1- 103 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	*	*	*	*	*		*	*	*	*	*	
"Kenneth Carl"												
2 - 626 BHP Diesel Main Engines (Detroit 16V92)	*	*	*	*	*		*	*	*	*	*	
2 - 76 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*		*	*	*	*	*	
1- 103 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	*	*	*	*	*		*	*	*	*	*	

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Part 70 Permit No. 01494
Permitted Emissions

Equipment	TONS PER YEAR						POUNDS PER HOUR					
	ROC	NOx	PM	SOx	CO	NH3	ROC	NOx	PM	SOx	CO	NH3
"Glenn C"												
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*		*	*	*	*	*	
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)	*	*	*	*	*		*	*	*	*	*	
"Doug C"												
3 - 535 BHP Diesel Main Engines (Detroit 6062)	*	*	*	*	*		*	*	*	*	*	
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)	*	*	*	*	*		*	*	*	*	*	
"Patrick"												
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*		*	*	*	*	*	
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*		*	*	*	*	*	
For Use Throughout Platform												
30 - Oil Wells	10.95						2.50					
2 - 500 BBL Closed Top Portable Tanks	0.19						0.04					
* - Included in Emissions Above												
** - Allison Turbine Generators are Worst Case												
+ - Back-up Generator is Worst Case												
Total Permitted Emissions	24.18	60.90	8.13	3.50	203.07	21.23	130.82	527.97	35.98	632.89	838.23	3.92

HAP Emissions Ref.: OCS HAP Emission Estimation Techniques and Calculations are included in Re-issuance Application and Maintained at the Facility.

M:\TITLEV\TV Permits\PO1494\Permit IV\[Tables_rev481,501.xlsx]Table 4

December 20, 2012

Mr. Shawn Hawley
Maverick Oil
P.O. Box 798
Fillmore, CA 93016

Subject: VCAPCD Permit to Operate No. 07500

Dear Mr. Hawley:

The subject VCAPCD Permit to Operate is due for renewal. A renewal fee of $653.79 will be required to renew the permit for the period from January 1, 2013 to December 31, 2013. Please remit this amount by check made payable to the Ventura County Air Pollution Control District. The renewed permit will be issued upon receipt of the fee.

Please note: The renewal fee is now due and payable. If the renewal fee is not paid within 60 days, the permit will be voided (VCAPCD Rule 30). The permit will then be reinstated only upon payment of the renewal fees and the penalties prescribed in VCAPCD Rule 42.

Please note: Changes were made to the draft per your October 29, 2012, letter to John Harader as well as the subsequent follow-up phone call of November 13, 2012. If you have any questions concerning those changes, please call John Harader at 805/645-1481.

A draft copy of the permit is enclosed for your review. Please verify that the permitted equipment is accurate, and that all permit conditions are acceptable by you. Please notify the District immediately if any information is incorrect.

If you have any questions on this matter, please call me at 805/645-1404.

Sincerely,

Laura Kranzler
Engineering Division

Enclosures

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Ventura County
Air Pollution
Control District

669 County Square Drive
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

Michael Villegas
Air Pollution Control Officer

December 20, 2012

Mr. Shawn Hawley
Maverick Oil
P.O. Box 798
Fillmore, CA 93016

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Sincerely,

Laura Kranzler
Engineering Division

Enclosures

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5. OIL WELL LIST

This permit authorizes the operation of a maximum number of wells for the production of oil or natural gas. This section of the permit contains a list of the wells currently authorized to be operated. When changes to the list are desired, the permit holder is required to submit an application to modify the Part 70 Permit.

An Authority to Construct is also required prior to adding a well that is newly drilled to the oil well list or prior to increasing the number of wells on the oil well list.

Section No. 8, "Permit Specific Conditions", includes a condition that limits the maximum number of producing wells at this stationary source. If applicable, Section No. 8 also includes a condition that requires best available control technology (BACT) on specific wells that were subject to Rule 26, "New Source Review".

Ventura County Air Pollution Control District

OIL WELL LIST

Part 70 Permit No. 01494

The following oil wells are on permit:

E-1	E-11	E-20 Long	E-27 Long
E-3 Short	E-12 Short (shut-in)	E-21 Short	E-28
E-4	E-12 Long	E-22 Long	
E-5 Long	E-13	E-23 Short (shut-in)	
E-6	E-14 Short	E-23 Long	
E-7 Short	E-14 Long	E-24	
E-7 Long	E-15	E-25 Short	
E-8	E-16 Long	E-25 Long	
E-9 Short	E-17	E-26 Short	
E-10	E-19	E-26 Long	

Total = 30 Oil Wells (active) & 2 Oil Wells (inactive)

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6. EXEMPT EQUIPMENT LIST

Rule 33.2.A.3 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to Rule 23 based on size or production rate. Pursuant to Rule 33.2.A.3, emissions from insignificant activities do not need to be included in the permit application.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)". This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in Rule 23, "Exemptions From Permit". Insignificant Activity is defined in Rule 33.1 (Part 70 Permits – Definitions). The permittee shall provide calculations, usage records, emission records, and/or operational data as necessary to substantiate an activity as insignificant.

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in Rule 33.2.A.3, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 9 of this permit may apply to these insignificant activities.

Ventura County Air Pollution Control District

INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT)

Part 70 Permit No. 01494

INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
** Onan Diesel Logging Unit (24 BHP)	Maximum design rating < 50 BHP	23.D.6
** Duetz Diesel Slickline Unit (43 BHP)	Maximum design rating < 50 BHP	23.D.6
Wipe Cleaning Operation	ROC content $\leq$ 25 g/l	23.F.10.b

** These units do not meet the definition of Insignificant Activity pursuant to Rule 33.1.13.c, but are exempt from District permitting requirements pursuant to Rule 23.D.6.

7. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. or CFR No.) #" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

Ventura County Air Pollution Control District
Rule 71.1.B.1.a Applicable Requirements
Tanks Equipped with Vapor Recovery

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to tanks at this stationary source equipped with a vapor recovery system which directs all vapors to a fuel gas system, a sales gas system, or to a flare. Specifically, this attachment applies to all storage tanks in a tank battery including wash tanks, produced water tanks, and wastewater separators, that are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks or other tanks not equipped with vapor recovery.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.B.1.a, all tanks shall be equipped with a properly installed, maintained and operated vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of either a system which directs all vapors to a fuel gas system, a sales gas system, or to a flare that combusts reactive organic compounds.

2. Pursuant to Rule 71.1.D.2, the vapor recovery provisions of Rule 71.1.B.1.a shall not apply during maintenance operations on vapor recovery systems or tank batteries, including wash tanks, produced water tanks and wastewater separators, if the Air Pollution Control District is notified verbally at least 24 hours prior to the maintenance operation and if the maintenance operation will take no more than 24 hours to complete.

3. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

4. On a quarterly basis, permittee shall monitor the storage tank vapor recovery system to ensure that compliance with Rule 71.1.B.1.a is being maintained. This shall include an inspection of the following components, as applicable, for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare. Permittee shall keep dated records of the quarterly inspections and tank maintenance activities. These records shall be maintained at the facility and submitted to the District upon request.

5. On an annual basis, permittee shall certify that storage tanks at the facility are complying with Rule 71.1.B.1.a. This annual compliance certification shall include verifying that the tanks are equipped with a vapor recovery system.

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Ventura County Air Pollution Control District
Rule 71.1.B.3 Applicable Requirements
Portable Tank Requirements

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to tanks designated on the Permit to Operate as portable, and used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. A portable tank is defined as a tank that can be moved from one location to another by attachment to a motor vehicle without having to be dismantled. A tank is further defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.B.3, portable tanks used to store or hold crude oil shall be equipped with both a closed cover that is impermeable to ROC vapors and a pressure-vacuum valve set by the manufacturer or according to the manufacturer's recommendations. A portable tank shall be defined as a tank that can be moved from one location to another by attachment to a motor vehicle without having to be dismantled.

2. Pursuant to Rule 71.1.D.1.c, the vapor recovery provisions of Rule 71.1.B.1 shall not apply to portable tanks if all of the following conditions are met:

    a. The portable tank is not used to increase the storage capacity of an existing tank battery.

b. The portable tank is not located within 150 feet of a tank battery that is subject to the vapor recovery provisions of Rule 71.1.B.1.

c. The portable tank is being used during maintenance activity at a tank battery or well and has not held or stored crude oil for more than 60 days.

3. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

4. On an annual basis, permittee shall certify that portable tanks at the facility are complying with Rule 71.1.B.3. This compliance certification shall include verifying the integrity of the roof and pressure-vacuum relief valve.

   For portable tanks that are not permanently located at the facility, permittee shall maintain records to show that the integrity of the roof and pressure-vacuum relief valve were verified when the tank was brought to the facility.

5. Pursuant to Rule 71.1.E.3, any person claiming the exemption of Rule 71.1.D.1.c for any portable tank shall maintain records indicating the number of days the tank has stored or held crude oil during the maintenance operation. In addition, the location of the portable tank relative to a tank battery, and whether the tank was connected to vapor recovery shall be indicated. These records shall be submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 71.5.B.1.a.1 Applicable Requirements
Glycol Dehydrators
Closed Pipe Control System to Fuel Gas or Sales Gas System

Rule 71, "Crude Oil and Reactive Organic Compound Liquids"
Adopted 12/13/94, Federally-Enforceable

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/92, Federally-Enforceable

Rule 71.5, "Glycol Dehydrators"
Adopted 12/13/94, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to all glycol dehydrators, regardless of size, anywhere natural gas is dehydrated. The glycol contacts and absorbs the water vapor in the gas and becomes rich glycol. This glycol is then regenerated by distilling the water. The distilled or lean glycol is then recycled back to the absorber. The glycol regenerator vent exhausts the water vapor, aromatic hydrocarbons and other reactive organic compounds (ROC) from the rich glycol distillation.

More specifically, this attachment applies to glycol dehydrators with regenerator vents that are controlled with a condenser/vapor disposal system. This attachment applies to control systems that use a closed pipe collection system that condenses ROC emissions and directs all vapors to a fuel gas system or sales gas system.

In addition to being subject to APCD Rule 71.5, "Glycol Dehydrators", the glycol reboiler portion of the glycol dehydrator is also subject to APCD Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters", if it utilizes a natural gas-fired reboiler with a heat input rating of 1.00 MMBTU per hour, or greater; or to APCD Rule 74.15, "Boilers, Steam Generators, and Process Heaters", if it utilizes a natural gas-fired reboiler with a heat input rating of 5.00 MMBTU per hour, or greater.

Conditions:

1. Pursuant to Rule 71.5.B.1.a.1, no person shall operate a gas dehydration system unless the reactive organic compound (ROC) emissions from the glycol regenerator vents are controlled by a condenser/vapor disposal system that collects and condenses ROC

emissions and directs all uncondensed ROC emissions to a vapor recovery/disposal system. The vapor disposal portion of the system shall consist of a system that directs all vapors to a fuel gas system or a sales gas system.

2. Pursuant to Rule 71.5.B.2, the condensed hydrocarbon liquid stream from the glycol dehydration vents shall be stored and handled in a manner that will not cause or allow the evaporation of ROC into the atmosphere, except as allowed by Section D, "Exemptions", of APCD Rule 71.1, "Crude Oil Production and Separation".

3. Pursuant to Rule 71.5.B.3, the emission control system shall be maintained in a leak-free condition.

   As detailed in Rule 71.B.14, a "gas leak" exists when a reading in excess of 10,000 ppm, as methane, above background, is obtained using an appropriate portable hydrocarbon analyzer and when sampling is performed according to the procedures specified in EPA Method 21 - Appendix A of 40 CFR Section 3.2.1. A "liquid leak" exists when the dripping of liquid containing reactive organic compounds at a rate of more than three (3) drops per minute is observed.

4. The glycol dehydrator emission control system's inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the glycol dehydrator ensures compliance with the leak-free condition requirement of Rule 71.5.B.3.

5. Pursuant to Rule 71.5.D.1, the operator of any glycol unit subject to Rule 71.5 shall maintain a current file of the information necessary to assist with rule compliance and shall submit this information to the District upon request. This information, at a minimum, shall include the following:

   a. Facility name, APCD permit number
   b. Location, size of glycol dehydrator reboiler (MMBTU/hr), amount of gas dehydrated (MMSCFD) and type of glycol used
   c. Description of any installed ROC control system
   d. Flow diagram of dehydrator and any ROC controls
   e. Maintenance records of the ROC control system

6. Permittee shall annually certify the glycol dehydrator emission control system to ensure that compliance with Rules 71.5.B.1.a.1, 71.5.B.2, and 71.5.B.3 is being maintained. This annual certification shall include a visual inspection assuring that the glycol dehydrator emission control system is a closed system, that the tank storing the condensed hydrocarbon liquid is a closed tank, and that the glycol unit is leak free.

Ventura County Air Pollution Control District
Rule 74.9.D.3 Applicable Requirements
Emergency Standby Stationary Internal Combustion Engines
Operated During Either an Emergency or Maintenance Operation

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment applies to emergency standby stationary internal combustion engines rated at 50 or more horsepower, not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations", and operated during an emergency or maintenance operation. Maintenance operation is limited to 50 hours per calendar year. Pursuant to Rule 74.9.D.3, emergency standby stationary internal combustion engines operated during an emergency or during maintenance operation of no more than 50 hours per calendar year are exempt from Sections B, C, and E of Rule 74.9.

As detailed in Rule 74.9.I.2 an emergency standby engine is defined as an internal combustion engine used only when normal power line or natural gas service fails, or for the emergency pumping of water for either fire protection or flood relief. An emergency standby engine may not be operated to supplement a primary power source when the load capacity or rating of the primary power source has been either reached or exceeded.

Conditions:

1. Pursuant to Section D.3 of Rule 74.9, an applicable emergency standby stationary internal combustion engine shall only be operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.

   Pursuant to Section I.5 of Rule 74.9, a maintenance operation is defined as the use of an emergency standby engine and fuel system during testing, repair and routine maintenance to verify its readiness for emergency standby use.

2. Pursuant to Section D.3 of Rule 74.9, each emergency standby engine shall be equipped with an operating, non-resettable, elapsed hour meter.

3. Pursuant to Section F.1 of Rule 74.9, the Annual Compliance Certification shall include the following records for each emergency standby engine: Engine manufacturer, model number, operator identification number, and location.

4. Pursuant to Section F.2 of Rule 74.9, the annual engine hours of maintenance operation shall be reported annually. A report shall be provided to the District after every calendar year by February 15.

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Ventura County Air Pollution Control District
Rule 74.9.D.8 Applicable Requirements
Stationary Diesel-Fired Internal Combustion Engines
Permitted Capacity Factor of 15 Percent or Less

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment applies to stationary diesel-fired internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations". As detailed in Rule 74.9.D.8, stationary diesel-fired internal combustion engines with a permitted capacity factor of 15 percent or less are exempt from Sections B, C, and E of Rule 74.9. The "permitted capacity factor" is defined as the annual permitted fuel use divided by the manufacturer's specified maximum hourly fuel consumption times 8760 hours per year. Specifically, this attachment applies to diesel engines that qualify for the 15 percent or less permitted capacity factor exemption.

Conditions:

1. Pursuant to Rule 74.9.D.8, the provisions of Section B (Requirements), Section C (Engine Operator Inspection Plan), and Section E (Recordkeeping Requirements) of Rule 74.9 shall not apply to stationary internal combustion diesel engines with a permitted capacity factor of 15 percent or less.

2. Each engine shall have a permitted annual diesel fuel limit stipulated in the Permit to Operate which equates to no more than 15 percent annual capacity.

3. The operator maintain the following records and submit them to the District upon request:

    a. Data for each engine verifying the manufacturer's specified maximum hourly fuel consumption;
    b. Data specifying the actual annual usage (e.g., fuel consumption or operating hours); and
    c. Data for each engine including the engine manufacturer, model number, operator identification number, and location of each engine.

4. The Annual Compliance Certification shall include a report of the engine's hours of operation or fuel usage.

Ventura County Air Pollution Control District
Rule 74.9.D.9 Applicable Requirements
Stationary Diesel-Fired Internal Combustion Engines
Used to Power Cranes and Welding Equipment

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment describes the requirements of APCD Rule 74.9, "Stationary Internal Combustion Engines", and applies to stationary diesel-fired internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations".

As detailed in Rule 74.9.D.9, stationary diesel-fired internal combustion engines used to power cranes and welding equipment are exempt from Sections B, C, and E of Rule 74.9.

Specifically, this attachment applies to diesel engines that are exempt because they are used to power cranes and welding equipment.

Conditions:

1. Pursuant to Rule 74.9.D.9, the provisions of Section B (Requirements), Section C (Engine Operator Inspection Plan), and Section E (Recordkeeping Requirements) of Rule 74.9 shall not apply to stationary internal combustion diesel engines used to power cranes and welding equipment.

2. The engine shall only be used to power a crane or welding equipment.

3. The operator shall maintain data for each engine including the function (usage) of the engine, manufacturer, model number, operator identification number, and location of each engine.

4. Permittee shall perform routine surveillance of the diesel-fired engine to ensure that compliance with Rule 74.9.D.9 is being maintained.

Ventura County Air Pollution Control District
Rule 26 (BACT) and Rule 74.23.B.1 Applicable Requirements
Stationary Gas Turbines
NOx Emission Limits
Three 4.0 MW Allison 501-KB5 Turbines

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Rule 74.23, "Stationary Gas Turbines"
Adopted 01/08/02, Federally-Enforceable

40 CFR Part 64, "Compliance Assurance Monitoring"
Federally-Enforceable

Applicability:

This attachment applies to three 4.0 MW Allison Model 501-KB5 stationary gas turbines when operated on natural gas and/or diesel fuel. The turbines are designated as G-1, G-2, and G-3. The turbines are required to comply with the emission limits and monitoring requirements of Rule 74.23, "Stationary Gas Turbines". The turbines are equipped with water injection systems and SCR for NOx control. The turbines have Best Available Control Technology (BACT) NOx emission limits that are more stringent than Rule 74.23 as required by Rule 26, "New Source Review", pursuant to Authority to Construct No. 01494-370 (issued May 16, 2006).

The emissions of nitrogen oxides (NOx) from these turbines are also subject to the monitoring requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" (CAM). In addition to the annual source tests required by Rule 74.23, daily monitoring is required by 40 CFR Part 64. This attachment requires that an Automatic Data Gathering System (ADGS) be used to monitor the water to fuel ratio, turbine section inlet temperature (T-5), aqueous ammonia injection rate, and SCR inlet temperature. These parameters are an indicator of compliance and a reading outside the compliance range is an excursion as defined in 40 CFR Part 64. This attachment also requires daily NOx measurements with a portable NOx analyzer at the each turbine exhaust. The daily NOx measurements are required for CAM compliance.

Conditions:

1. Turbine NOx Limits:

   Oxides of Nitrogen (NOx expressed as NO_2) emissions from Turbines G-1, G-2, and G-3 shall not exceed 2.5 ppmvd while burning natural gas and shall not exceed 6.5 ppmvd while burning diesel fuel.

Operation at loads of less than thirty percent (1,000 KW output) are exempt from the above NOx emission limits based on a 40 CFR Part 55.7 exemption request. **Oxides of Nitrogen (NOx expressed as NO_2) emissions from Turbines G-1, G-2, and G-3 while operating at loads less than thirty percent (1,000 KW output) shall not exceed 5.0 ppmvd while burning natural gas and shall not exceed 13.0 ppmvd while burning diesel fuel.**

These limits shall be referenced at fifteen (15) percent volume stack gas oxygen on a dry basis. Compliance with this condition shall be verified by annual source testing as required by Condition No. 4. These NOx emission concentration limits are required for BACT (Best Available Control Technology) compliance and are more stringent than Rule 74.23, "Stationary Gas Turbines", and 40 CFR Part 60 Subpart GG, "Standards of Performance for Stationary Gas Turbines".

2. Pursuant to Rule 74.23.B.4, the stack outlet concentration of ammonia (NH_3) at Turbines G-1, G-2, and G-3 shall not exceed 20 ppmvd, referenced at fifteen (15) percent volume stack gas oxygen on a dry basis. Compliance with this condition shall be verified by annual source testing as required by Condition No. 4.

3. The NOx and NH_3 emission limits shall not apply to the turbines when they are operated during the thermal stabilization period associated with a start-up, planned shutdown, or unplanned load change. These exemptions shall not exceed one (1) hour. For failed start-ups, each restart shall begin a new exemption period (Rule 74.23.C.1.e). A start-up is the process of bringing an applicable unit and its associated emission control device up to operating temperature (Rule 74.23.H.10). A planned shutdown is a premeditated shutdown not caused by automatic sensors or other instrumentation (Rule 74.23.H.7). An unplanned load change is the automatic release of power from the turbine and the subsequent restart; loss of power during the release must exceed forty (40) percent of the turbine rating (Rule 74.23.H.12).

4. Pursuant to Rule 74.23.B.1, each turbine shall be source tested not less than once every 12 months (annually) utilizing the following methods as detailed in Rule 74.23.F:

a.	NOx	EPA Method 20
b.	Oxygen Content	ARB Method 100
c.	NH_3	BAAQMD Method ST-1B (Jan. 20, 1982)

The average of three source test runs shall be used to determine compliance. The tests shall be conducted at 30, 50, 75, and 100 percent loads. Prior to conducting an annual emissions test, permittee shall notify the APCD Compliance Division. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report shall include the following parameters at all four loads: emissions

of NOx and NH_3 in parts per million by volume corrected to 15% oxygen on a dry basis, pounds per hour and pounds per million BTU; the amount of excess oxygen in percent by volume; the fuel and exhaust flow rates, in standard cubic feet per minute; the turbine load in MW; the water injection rate; the water to fuel ratio, turbine section inlet temperature (T-5), aqueous ammonia flow rate, and SCR inlet temperature. The test report and results shall be submitted to the APCD Compliance Division within 45 days after the test.

5. Pursuant to Rule 74.23.B.2 and 40 CFR Part 64, the permittee shall operate, and maintain in calibration, equipment that continuously measures and records the following parameters at each turbine:

   a. Water to fuel ratio;
   b. Type and amount of fuel consumed at all loads;
   c. Type and amount of fuel consumed at loads less than 1,000 KW;
   d. Elapsed time of operation;
   e. Turbine section inlet temperature (T-5);
   f. Aqueous ammonia injection rate; and
   g. SCR inlet temperature.

   An Automatic Data Gathering System (ADGS) shall be utilized to measure and record these turbine parameters. The ADGS shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's specifications and recommendations.

   The water to fuel ratio, aqueous ammonia injection rate, SCR inlet temperature, and the turbine section inlet temperature (T-5) shall be maintained at the values specified in Condition No. 6 below. A water to fuel ratio, aqueous ammonia injection rate, or an SCR inlet temperature that is less than, or a turbine section inlet temperature (T-5) that is greater than, the values specified below shall be considered an excursion as defined in 40 CFR Part 64. An excursion is defined as "a departure from an indicator range established for monitoring". Once during each eight (8) hour shift, the permittee shall observe the water to fuel ratios, aqueous ammonia injection rate, SCR inlet temperature, and turbine section inlet temperature (T-5) to check for any excursions from the values specified below. Upon detecting such an excursion, the permittee shall inspect the turbine, water injection system, and SCR system and make repairs or adjustments as necessary, and restore the water to fuel ratio, turbine section inlet temperature (T-5), aqueous ammonia injection rate, and SCR inlet temperature to values specified below as expeditiously as practicable in accordance with good air pollution control practices.

6. Pursuant to Rule 74.23.B.2 and 40 CFR Part 64, the permittee shall operate the turbines within the following parameters:

a. During operation of the turbines on natural gas at loads greater than thirty percent (1,000 KW), the water to fuel ratio (measured in units of pounds of water per pound of natural gas burned) shall be greater than or equal to 0.69 lb water/lb fuel averaged over any one hour period.

b. During operation of the turbines on diesel at loads greater than thirty percent (1,000 KW), the water to fuel ratio (measured in units of pounds water per pound diesel burned) shall be greater than 0.69 lb water/lb fuel averaged over any one hour period.

c. The aqueous ammonia injection rate (gallons per hour) at each turbine shall be greater than or equal to the rates specified below:

Minimum Ammonia Injection Rate (gal/hr)			
Natural Gas	G-01	G-02	G-03
30% Load	0.7	0.7	0.7
50% Load	0.9	0.9	0.9
75% Load	1.3	1.3	1.3
100% Load	2.0	2.0	2.0

Minimum Ammonia Injection Rate (gal/hr)			
Diesel	G-01	G-02	G-03
30% Load	1.0	1.0	1.0
50% Load	1.41	1.41	1.41
75% Load	2.0	2.5	2.0
100% Load	3.0	3.4	3.0

d. The SCR inlet temperature at each turbine shall be maintained between 500 and 750 degrees Fahrenheit.

e. The turbine section inlet temperature (T-5) at each turbine shall not exceed 1895 degrees Fahrenheit while burning natural gas or diesel.

These operating parameters are for minimum NOx control; a greater water to fuel ratio or aqueous ammonia rate may be necessary in order to achieve the NOx emission limits. Operation outside these parameters are considered to be a CAM "excursions" as defined in 40 CFR Part 64 (see Condition No. 7.c).

On an annual basis for each turbine, the water to fuel ratio, the aqueous ammonia injection rate, the SCR inlet temperature, and the turbine section inlet temperature (T-5) shall be compared to the concentrations of nitrogen oxides as measured by EPA Method 20 as described in Condition No. 4 above. If this annual EPA Method 20 testing

indicates that the specified parameters need to be revised to comply with the nitrogen oxide limits of Condition No. 1, the permittee shall submit an application to modify the permit to reflect the revised values.

7. Additional Compliance Assurance Monitoring (CAM) requirements:

The permittee shall comply with the following additional monitoring requirements for Turbines G-1, G-2, and G-3 for 40 CFR Part 64, "Compliance Assurance Monitoring", as follows:

a. The exhaust stack shall be equipped with a sampling port or other sampling location to allow the placement of a sampling probe downstream of the SCR system.

b. On a daily basis, the permittee shall measure and record the concentration of nitrogen oxides and oxygen in the exhaust using a portable emissions analyzer. The concentration of nitrogen oxides, expressed as nitrogen dioxide, shall be measured in parts per million by volume on a dry basis (ppmvd) corrected to 15% oxygen. The portable analyzer may also be installed at a fixed location near the turbine's exhausts in order to provide the required daily readings. The manufacturer and model of the portable emissions analyzer shall be subject to District approval.

c. A nitrogen oxides concentration of greater than 2.5 ppmvd at 15% oxygen while burning natural gas or greater than 6.5 ppmvd at 15% oxygen while burning diesel as measured by the portable emissions analyzer shall be considered an excursion as defined in 40 CFR Part 64. An excursion is defined as "a departure from an indicator range established for monitoring" in 40 CFR Part 64. Upon detecting such an excursion, the permittee shall inspect the engine and SCR system, make repairs or adjustments as necessary, and restore the turbine exhaust emissions to less than 2.5 ppmvd at 15% oxygen while burning natural gas or 6.5 ppmvd at 15% oxygen while burning diesel as expeditiously as practicable in accordance with good air pollution control practices.

d. The portable emissions analyzer shall be calibrated, operated, and maintained in accordance with the manufacturer's specifications and recommendations. On an annual basis, the measured concentrations of nitrogen oxides of the portable analyzer shall be compared to the concentrations of nitrogen oxides as measured by EPA Method 20 as described in Condition No. 4 above. If this annual EPA Method 20 testing indicates that the turbine is exceeding the nitrogen oxide limits of Condition No. 1 above when the portable emissions analyzer does not indicate an excursion, the permittee shall promptly notify the District and report this situation as a deviation from a Part 70 permit requirement.

e. In addition to the records required by Condition No. 9 (Rule 74.23.D) below, the permittee shall maintain records of portable emissions analyzer readings for the turbine including the date, time, nitrogen oxides concentration in ppmvd corrected to 15% oxygen, and for excursions as defined above, a summary of any corrective actions taken.

f. In addition to the reports required by Condition No. 8 (Rule 74.23.E) below, the permittee shall submit a written report to the District Compliance Division that includes the number and duration of excursions, the cause of the excursion (including unknown if applicable), and the corrective action taken.

8. Pursuant to Rule 74.23.E and 40 CFR Part 64, the permittee shall submit a report to the District every six months that contains the following information:

a. Actual annual fuel consumption for the previous twelve months for each turbine at all loads and at loads less than 1000 KW;
b. A copy of the required annual source test report(s);
c. The number and duration of excursions, the cause of the excursion (including unknown if applicable), and the corrective action taken.

9. Pursuant to Rule 74.23.D and 40 CFR Part 64, the permittee shall record and/or maintain the following information:

a. Water to fuel ratio log;
b. Type and amount of fuel consumed at all loads;
c. Type and amount of fuel consumed at loads less than 1,000 KW;
d. Elapsed time of operation;
e. Aqueous ammonia injection rate;
f. SCR inlet temperature;
g. Turbine section inlet temperature (T-5);
h. The annual source test report;
i. The number and duration of excursions the cause of the excursion (including unknown if applicable), and the corrective action taken.

Ventura County Air Pollution Control District
New Source Performance Standards
40 CFR Part 60 Subpart GG Applicable Requirements
Standards of Performance for Stationary Gas Turbines

40 CFR Part 60, "Standards of Performance for New Stationary Sources"
40 CFR Part 60, Subpart A, "General Provisions"
40 CFR Part 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines"
Federally-Enforceable

Applicability:

This attachment describes the requirements of 40 CFR Part 60 Subpart GG, "Standards of Performance for Stationary Gas Turbines", and 40 CFR Part 60 Subpart A, "General Provisions", and applies to stationary gas turbines with heat inputs equal to or greater than 10.7 gigajoules per hour (approximately 10 MMBTU/Hr) and less than 107.2 gigajoules per hour (approximately 100 MMBTU/Hr) based on the lower heating value of the fuel fired which were constructed, modified, or reconstructed after October 3, 1977. The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart GG and is considered to be the Administrator.

Conditions:

1. Oxides of Nitrogen (NOx expressed as NO_2) emissions from an applicable turbine shall not exceed 150 ppmvd. This limit shall be referenced at fifteen (15) percent volume stack gas oxygen on a dry basis, and corrected to ISO standard conditions as detailed in 60.335(c)(1). The District is not providing allowances for unit efficiency or fuel bound nitrogen. (60.332(c) and 60.332(a)(2))

2. Sulfur dioxide (SO_2) emissions from an applicable turbine unit shall not exceed 0.015 percent by volume (150 ppmvd). This limit shall be referenced at fifteen (15) percent volume stack gas oxygen on a dry basis. (60.333(a))

3. The emission limits listed above shall not apply to the turbines when they are operated under the following conditions:

    a. The NOx emission limit shall not apply to applicable natural gas fired turbines when being fired with an emergency fuel. Emergency fuel is defined as a fuel fired by a gas turbine only during circumstances, such as natural gas supply curtailment or breakdown of delivery system, that make it impossible to fire natural gas in the gas turbine. (60.332(k) and 60.331(r))

    b. The NOx and SO_2 emission limits shall not apply during periods of startup, shutdown, and malfunction. (60.8(c))

4. The sulfur content of the fuel burned in the applicable turbine shall not exceed 0.8 percent by weight. (60.333(b))

5. If the subject turbine is equipped with water injection for NOx control, the permittee shall operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within $\pm$5.0% and shall be approved by the District. (60.334(a))

   For the purpose of reports required under 60.7(c), periods of excess emissions that shall be reported are defined as any one-hour period during which the average water-to-fuel ratio falls below the water-to-fuel ratio determined to demonstrate compliance with the 150 ppmvd NOx limit by the most recent performance test. (60.334(c)(1))

   The permittee shall maintain a file of all continuous emission monitoring measurements and information, and performance tests pursuant to 60.7(f).

6. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. (60.7(b))

7. The permittee shall monitor and record the sulfur content of the fuel being fired in the turbine. The following test schedules and methods shall be used:

   a. The sulfur content of liquid fuels shall be determined on each occasion that fuel is transferred to the storage tank from any other source. Test Method ASTM D 2880-71 shall be used. (60.334(b)(1) and 60.335(d))
   b. The sulfur content of gaseous fuels shall be determined every six months, as established by the Administrator. Test Methods ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used. (60.334(b)(2) and 60.335(d))

8. Pursuant to 40 CFR Part 60.334(c), excess emissions and monitoring systems performance report, and/or an emissions and monitoring summary report shall be submitted to the District on a quarterly basis. Reporting format shall follow 40 CFR Part 60 Section 60.7(c) and (d). All reports shall be postmarked by the 30th day following the end of the calendar quarter as required by 60.7(c). The frequency of the excess emission reports may be reduced by following the procedure detailed in 60.7(e). For purpose of this notice, the following information shall be included in the report:

   a. Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the 150 ppmvd NOx limit by the most recent

performance test. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. (60.7(c) and 60.334(c)(1))

b. Exceedances of the 0.8 percent by weight sulfur content fuel limit. (60.7(c) and 60.334(c)(2))

c. Each period, type, reason and duration of the firing of emergency fuel. (60.7(c) and 60.334(c)(4))

9. Upon request by the District, the permittee shall perform an emissions test to determine the NOx and SOx emissions from the turbine. EPA Method 20 shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NOx emissions shall be determined at 30, 50, 75, and 100 percent loads or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. (60.8 and 60.335(c)(3))

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Ventura County Air Pollution Control District
California Airborne Toxic Control Measure For
Stationary Compression Ignition Engines
Engines Used Solely on OCS Platforms

Section 93115, Title 17, California Code of Regulations, Airborne Toxic Control Measure For Stationary Compression Ignition (CI) Engines
Effective 05/19/11

The District is required to implement and enforce the state ATCM. The ATCM is not federally-enforceable.

Applicability:

This attachment describes the requirements of California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition (CI) Engines that apply to in-use stationary diesel-fueled CI engines that are operated solely on OCS Platforms. Section 93115.3(h) of the ATCM exempts such engines from the operating requirements and emission standards for new and in-use engines as listed in Sections 93115.6 and 93115.7 of the ATCM. Pursuant to Section 93115.4(a)(8) CARB Diesel Fuel means any diesel fuel that meets the specifications of vehicular diesel fuel, as defined in title 13, CCR, sections 2281 and 2282. The Verification Procedure is defined in Section 93115.4(a)(78).

Conditions:

1. Pursuant to subsection 93115.5(a), as of January 1, 2006, the permittee shall not fuel the engine with any fuel unless the fuel is one of the following:

    a. CARB Diesel Fuel, or
    b. An alternative diesel fuel that is:
        1) biodiesel;
        2) a biodiesel blend that does not meet the definition of CARB diesel Fuel
        3) a Fischer-Tropsch fuel; or
        4) an emulsion of water in diesel fuel; or
    c. any alternative diesel fuel that is not identified in section 93115.5(a)(2) and meets the requirements of the Verification Procedure; or
    d. an alternative fuel; or
    e. CARB Diesel Fuel used with fuel additives that meets the requirements of the Verification Procedure; or
    f. any combination of the above.

2. Pursuant to subsection 93115.10(f)(1), the permittee shall keep records and prepare a monthly summary that shall list and document the nature of use for each of the following:

a. Emergency use hours of operation;
b. Maintenance and testing hours of operation;
c. Type of fuel use in the engines. For engines operated exclusively on CARB Diesel Fuel, the owner or operator shall document the use of CARB Diesel Fuel through the retention of fuel purchase records indicating that the only fuel purchased for supply to an emergency standby engine was CARB Diesel Fuel; or for engines operated on any fuel other than CARB Diesel Fuel, the fuel records demonstrating that the only fuel purchased and added to an emergency standby engine or engines, or to any fuel tank directly attached to an emergency standby engine or engines, meets the requirements of section 93115.5(b).

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Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
For Stationary Reciprocating Internal Combustion Engines
Existing Emergency Diesel Engines at an Area Source of HAPs

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT)

Applicability:

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing emergency diesel engines at an area source. An engine is defined as "existing" if it was constructed before June 12, 2006. A stationary source is defined as an "area source" if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

Pursuant to Section 63.6675, an "emergency engine" is any engine whose operation is limited to emergency situations and required testing and maintenance. An emergency can be the loss of grid power or the stationary source's own power production. Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a demand response program are not considered emergency stationary RICE.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements no later than May 3, 2013.

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:

    a. Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.

    b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

    c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Pursuant to Table 2d, if an emergency RICE is operating during an emergency and it is not possible to perform the above maintenance or if performing the maintenance would otherwise pose an unacceptable risk under federal, state, or local law, the maintenance can be delayed and should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. All such maintenance delays shall be reported to the APCD Compliance Division.

2. Pursuant to Section 63.6625(e) and 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

3. Pursuant to Section 63.6625(f), the RICE shall be equipped with a non-resettable hour meter.

4. Pursuant to Section 63.6625(h), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

5. Pursuant to Sections 63.6640(f) and 63.6675, the permittee shall operate the emergency RICE in compliance with the following requirements:

   a. There is no time limit on the use of emergency stationary RICE in emergency situations.

   b. The emergency stationary RICE may not be operated for peak shaving as part of a financial agreement to supply power into the grid, or as part of a demand response program, unless specifically allowed by this permit.

6. Pursuant to Sections 63.6655(e) and 63.655(f), the permittee shall maintain the following records:

   a. Records of maintenance conducted on the stationary emergency RICE.

   b. Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

7. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

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Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
for Stationary Reciprocating Internal Combustion Engines
Existing Non-Emergency Diesel Engines ≤ 300 HP at an Area Source of HAPs

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT)

Applicability:

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing non-emergency diesel engines rated at less than or equal to 300 HP (horsepower) at an area source. An engine is defined as "existing" if it was constructed before June 12, 2006. A stationary source is defined as an "area source" if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

A non-emergency engine is any engine whose operation does not meet the definition of an "emergency engine" as defined in Section 63.6675. Pursuant to Section 63.6675, an "emergency engine" is any engine whose operation is limited to emergency situations and required testing and maintenance. An emergency can be the loss of grid power or the stationary source's own power production. Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a demand response program are not considered emergency stationary RICE.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements no later than May 3, 2013.

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:

    a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.

    b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

2. Pursuant to Section 63.6604, the permittee shall use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel.

3. Pursuant to Section 63.6625(e) and 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

4. Pursuant to Section 63.6625(h), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

5. Pursuant to Section 63.6655(e), the permittee shall maintain records of the maintenance conducted on the stationary RICE.

6. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

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Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
for Stationary Reciprocating Internal Combustion Engines
Existing Non-Emergency Diesel Engines > 500 HP at an Area Source of HAPs

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT)

Applicability:

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing non-emergency diesel engines rated at greater than 500 HP (horsepower) at an area source. An engine is defined as "existing" if it was constructed before June 12, 2006. A stationary source is defined as an "area source" if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

A non-emergency engine is any engine whose operation does not meet the definition of an "emergency engine" as defined in Section 63.6675. Pursuant to Section 63.6675, an "emergency engine" is any engine whose operation is limited to emergency situations and required testing and maintenance. An emergency can be the loss of grid power or the stationary source's own power production. Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a demand response program are not considered emergency stationary RICE.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements no later than May 3, 2013.

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, and Section 63.6625(h), during periods of startup, the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations listed in the conditions below apply.

2. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements for non-emergency, non-black start (i.e., black start means to only

start up a combustion turbine) CI stationary RICE > 500 HP, except during periods of startup:

a. Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O2; or

b. Reduce CO emissions by 70 percent or more.

3. Pursuant to Section 63.6603(a), Table 2b, if an oxidation catalyst is installed to meet the above requirements, the permittee shall maintain the catalyst so that the pressure drop across the catalyst stays within the required range and the engine exhaust temperature at the catalyst inlet stays within the required range. If the engine is not equipped with an oxidation catalyst, then the permittee shall comply with operating limitations approved after the unit has achieved compliance with the emissions limits. Prior to installing an oxidation catalyst, the permittee shall apply for, and obtain, an APCD Authority to Construct.

4. Pursuant to Section 63.6604, the permittee shall use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel.

5. Pursuant to Sections 63.6612 and 63.6630, the permittee shall conduct initial performance tests according to Tables 4 and 5. This may include testing pursuant to EPA Method 10 for meeting the CO ppmvd limit or testing with a portable CO and oxygen analyzer for meeting the CO percent reduction limit. The testing is required within 180 days after the compliance date (May 3, 2013).

6. Pursuant to Section 63.6620 and Section 63.6640, Table 6, the permittee shall conduct subsequent performance tests every 8,760 hours of operation or every three years, whichever comes first. Testing shall be conducted as stipulated in Section 63.6620 and Table 4.

7. Pursuant to Section 63.6625, if the unit is equipped with a CEMS (Continuous Emission Monitoring System) or CPMS (Continuous Parameter Monitoring System), the permittee shall comply with the monitoring requirements of Section 63.6625(a) or 63.6625(b).

8. Pursuant to Section 63.6625(g), if the unit is not equipped with a closed crankcase ventilation system, the permittee shall install such a system or install an open crankcase filtration emission control system.

9. Pursuant to Section 63.6650 and Table 7, the permittee shall submit semiannual compliance reports. The compliance report shall contain the information specified in Sections 63.6650(c)(1) through (6).

10. Pursuant to Section 63.6655, the permittee shall maintain all applicable records described in Sections 63.6655(a)(1) through (a)(5) and (b)(1) through (b)(3).

11. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

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8. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, "New Source Review" requirements (e.g., BACT and offset requirements), or Rule 29, "Conditions on Permits" requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 7.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment PO (Title V Permit No.) PC#" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

Ventura County Air Pollution Control District
Additional Permit Requirements
Platform Gail Additional Requirements

Rule 26, "New Source Review"

Rule 29, "Conditions on Permits"

For OCS sources, conditions applied pursuant to Rule 26 or Rule 29 are federally enforceable.

Applicability:

This attachment applies to Platform Gail. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, "Permitted Throughput and Consumption Limit Table", of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rule 29)

2. The permitted emissions authorized by this permit are based in part on the fugitive emissions from 30 oil wells. Wells with dual completions are considered separate oil wells. This platform currently has 30 oil well completions. An Authority to Construct is required to be obtained from the District prior to drilling any wells, unless that activity is a redrill. Emission offsets must also be provided with the submittal of any application to increase the number of wells beyond 30 wells. (Rule 29)

3. The following wells shall be free flowing or operated with electric motor driven artificial lift equipment:

E-7 Short	E-12 Short	E-21 Short	E-24 Short	E-27 Long
E-7 Long	E-12 Long	E-22 Long	E-24 Long	E-28
E-9 Short	E-14 Short	E-23 Short	E-25 Short	
E-11	E-14 Long	E-23 Long	E-25 Long	

This condition is applied as Best Available Control Technology. (Rule 26)

4. All diesel fuel consumed in the crane engines, turbines, turbine starter engines, backup generator engine, and in the boats shall contain 0.05% sulfur by weight, or less. In order to comply with this condition, permittee shall maintain fuel records, or certification from the fuel supplier, documenting the sulfur content of each diesel fuel delivery. (Rule 29)

5. The permitted emissions for crew boats, work boats, and specialty vessels (as defined below) servicing this OCS Platform shall not exceed the following limits:

	ROC	NOx	PM	SOx	CO
Tons/Year	2.77	46.87	2.80	0.63	8.52

In order to comply with this condition, the permittee shall maintain monthly records of diesel fuel consumption for all crew boats, work boats, and specialty vessels servicing Venoco OCS Platforms Grace and Gail. Boats not owned by Venoco that are providing emergency oil spill response or training shall not be included in these records. The fuel usage, in gallons, shall be allocated 35% to Platform Grace and 65% to Platform Gail for the work boat and 40% to Platform Grace and 60% to Platform Gail for the crewboat. Specialty vessel fuel usage shall be allocated to the platform at which the service is being provided. The fuel usage figures, in gallons per month, shall be multiplied by the following District approved emission factors, in units of pounds per thousand gallons (lbs/Mgal), and multiplied by the appropriate conversion factors to obtain emissions in units of tons per month:

	ROC	NOx	PM	SOx	CO
Lbs/Mgal	33.15	561.00	33.50	7.50	102.00

Using these emission factors, the annual permitted emissions for the crew and work boats at this platform are equivalent to an annual diesel fuel limitation of 167,100 gallons per year.

The monthly boat emissions shall be summed for the previous 12 months. The emission totals for the previous 12 months in excess of the above limits shall be considered to be a violation of this condition.

This boat emission calculation method is for the purposes of demonstrating compliance with the above permitted emission limits only. If permittee wishes to submit an application to create an ERC (emission reduction credit) from reducing permitted emissions from boats servicing this platform, an analysis shall be submitted with the application, as required by APCD Rule 26.4.E.2, to demonstrate that the emission reduction is real, quantifiable, permanent, enforceable, and surplus. This analysis shall include, but is not limited to, source test data and actual fuel use data on individual boat engines that may be subject to an application for ERCs.

Specialty vessels are any vessels that are used for temporary projects at the platforms other than the crew and work boats listed in Condition Nos. 6 and 7 below and the permitted equipment tables, emergency oil spill response vessels, or training vessels. These vessels include, but are not limited to, derrick and/or crane barges and acidizing and/or cementing vessels. When such services are required, the permittee shall provide the APCD Compliance Division with a description of the vessel and its intended use, including the service to be performed and approximate days on site, at least 24 hours prior to such use. The vessel description shall include the name of the vessel and a description of all engines with a maximum rating of greater than or equal to 50 BHP, including make, model, and rated capacity (BHP). The permittee shall maintain a log showing the days and hours that each specialty vessel is in service at the platform. (Rules 26 and 29)

6. There are forty-nine permitted engines which are used on nine Crew Boats:

"Glenn C"
4 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 124 BHP Diesel Generator Engines, Detroit 4-71N
"Doug C"
3 - 535 BHP Diesel Main Engines, Detroit 6062
2 - 50.5 BHP Diesel Generator Engines, Lugger L984
"Ryan T"
4 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 75 BHP Diesel Generator Engines, Detroit 3-71
"Robbie Tide"
3 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 75 BHP Diesel Generator Engines, Detroit 3-71
"Patrick"
3 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 75 BHP Diesel Generator Engines, Detroit 3-71
"Jackie C"
4 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 65 BHP Diesel Generator Engines, Detroit 3-71
1 - 89 BHP Diesel Fire Water Pump Engine, Detroit 4-71
"Aces Wild"
3 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 65 BHP Diesel Generator Engines, Detroit 3-71
"Danny C"
2 - 365 BHP Diesel Main Engines, Caterpillar 3406 C
1 - 40 BHP Diesel Generator Engine, Isuzu 4JB1
1 - 32 BHP Diesel Generator Engine, Northern Lights M20
1 - 46 BHP Diesel Hydraulic Engine, Detroit 271
"Ace High

2 - 650 BHP Diesel Main Engines, Detroit 12V92TI
1 - 510 BHP Diesel Main Center Engine, Detroit 12V71TI
2 - 65 BHP Diesel Generator Engines, Detroit 3-71

These nine sets of crew boat engines shall not be used simultaneously for servicing Platform Gail. Only a single Crew Boat may be used at any given time at Platform Gail. The permittee shall maintain a log showing the days and hours that each crew boat is in service to Platform Gail. (Rule 29)

7. There are seventy three permitted engines which are used on thirteen Work Boats:

"Victory Seahorse"
2 - 2500 BHP Diesel Main Engines, EMD 16-645-ED3A
2 - 200 BHP Diesel Generator Engines, Detroit 8V-71
1 - 300 BHP Diesel Thruster Engine, Detroit 8V-71
"Santa Cruz"
2 - 2000 BHP Diesel Main Engines, Caterpillar 3516B
2 - 245 BHP Diesel Generator Engines, Caterpillar 3306
1 - 515 BHP Diesel Thruster Engine, Caterpillar 3408
"Toby Tide"
2 - 1125 BHP Diesel Main Engines, Caterpillar 3516B
2 - 200 BHP Diesel Generator Engines, Detroit 8V-71
1 - 300 BHP Diesel Thruster Engine, Detroit 8V-71
"Sea Tide"
2 - 1220 BHP Diesel Main Engines, DDEC 12V149TI
2 - 200 BHP Diesel Generator Engines, Detroit 8V-71
1 - 200 BHP Diesel Thruster Engine, Detroit 6V-71
"Robin J"
2 - 600 BHP Diesel Main Engines, GM 1692
2 - 21 BHP Diesel Generator Engines, GM 471
"O'Neil Tide"
2 - 1125 BHP Diesel Main Engines, Caterpillar D399T/A
2 - 243 BHP Diesel Generator Engines, Caterpillar 3306 DIT
1 - 325 BHP Diesel Thruster Engine, Caterpillar 3406 DIT
1 - 325 BHP Diesel Aux Fire Pump Engine, Caterpillar 3406 DIT
2 - 243 BHP Diesel Aux Liquid Pump Engine, Caterpillar 3306 DIT
"San Miguel"
2 - 2000 BHP Diesel Main Engines, Caterpillar 3516B DITA SCAC
2 - 247 BHP Diesel Generator Engines, Caterpillar 3306 DIT
1 - 550 BHP Diesel Thruster Engine, Caterpillar 3408 DITA
1 - 315 BHP Diesel Compressor Engine, Caterpillar 3306 DITA
1 - 306 BHP Diesel Aux Pump Engine, Caterpillar 3406 DIT
1 - 273 BHP Diesel Winch Engine, Detroit 8V-71

"Jackie C"
4 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 65 BHP Diesel Generator Engines, Detroit 3-71
1 - 89 BHP Diesel Fire Water Pump Engine, Detroit 4-71
"Patriot II"
2 - 626 BHP Diesel Main Engines, Detroit 12V92
2 - 103 BHP Diesel Generator Engines, Detroit 4-71
1 - 103 BHP Diesel Fire Water Pump Engine, Detroit 4-71
"Kenneth Carl"
2 - 626 BHP Diesel Main Engines, Detroit 12V92
2 - 76 BHP Diesel Generator Engines, Detroit 3-71
1 - 103 BHP Diesel Fire Water Pump Engine, Detroit 4-71
"Glenn C"
4 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 124 BHP Diesel Generator Engines, Detroit 4-71N
"Doug C"
3 - 535 BHP Diesel Main Engines, Detroit 6062
2 - 50.5 BHP Diesel Generator Engines, Lugger L984
"Patrick"
3 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 75 BHP Diesel Generator Engines, Detroit 3-71

These thirteen sets of work boat engines shall not be used simultaneously for servicing Platform Gail. Only a single Work Boat may be used at any given time at Platform Gail. The permittee shall maintain a log showing the days and hours that each work boat is in service to Platform Gail. (Rule 29)

8. For solvent cleaning activities, including wipe cleaning, permittee shall maintain monthly records of solvent purchase and usage along with records of solvent that is recycled or disposed of properly.

Pursuant to Rule 23.F.7, the use of solvents, in addition to the use of coatings, adhesives, lubricants, and sealants; for facility and building maintenance and repair is exempt from permit. However, the use of such materials by contractors for the maintenance and repair of process and industrial equipment is not exempt from permit pursuant to Rule 23.F.7, unless the material is exempted under another specific section of Rule 23. Pursuant to Rule 23.F.10, the use of cleaning agents that contain two percent or less organic solvent, by weight, as used or applied (Rule 23.F.10.a) and the use of nonrefillable aerosol cleaning products (Rule 23.F.10.b), is also exempt from permit. Materials exempted from permit pursuant to Rule 23.F.7, Rule 23.F.10.a, and Rule 23.F.10.b do not need to be included in the monthly records.

The monthly records shall be summed for the previous 12 months. Net solvent usage totals for any of these 12 calendar month rolling periods in excess of the Rule 23.F.10.d exemption shall be considered a violation of this permit.

This permit does not limit the usage of acetone. Acetone is exempt from permit and record keeping requirements, as it is not defined as a reactive organic compound. (Rule 29)

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Ventura County Air Pollution Control District
Additional Permit Requirements
656.3 MMBTU/Hr Low Pressure Flare
1,312.5 MMBTU/Hr High Pressure Flare

Rule 29, "Conditions on Permits"

Rule 71.1, "Crude Oil Production and Separation"
Adopted 6/16/92, Federally-Enforceable

For OCS sources, conditions applied pursuant to Rule 29 are federally enforceable.

Applicability:

This attachment applies to the 656.3 MMBTU/Hr low pressure flare and the 1,312.5 MMBTU/Hr high pressure flare located on Platform Gail. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Gas consumption at the flares shall not exceed the following limits for any planned flaring events:

1312.5 MMBTU/Hr high pressure flare:	4.9 MMCF/Yr
656.3 MMBTU/Hr low pressure flare:	2.31 MMCF/Yr

These are the same limits listed in Table 3 of this permit.

There is no limit for emergency use. Emergency use is defined as disposal of process gases in the event of unavoidable process upsets. A planned flaring event includes, but is not limited to, routine flaring to comply with Rule 71.1; or flaring due to planned maintenance performed on wells, equipment, or pipeline by the operator or performed by another operator accepting the produced gas. If a process upset (emergency use) cannot be rectified in a reasonable amount of time, the use of the flare may be determined to be a planned flaring event.

In order to demonstrate compliance with this condition, the permittee shall maintain records of flare gas consumption. The permittee shall maintain monthly records which differentiate between emergency usage and planned flaring events. The monthly records shall be summed for the previous 12 months. Flare gas combustion totals for planned flaring events for any of these 12 month rolling periods in excess of the specified limit shall be considered a violation of this permit.

2. Each flare shall have an individual fuel meter installed to record the amount of natural gas consumed. The natural gas consumption recorded at the low pressure flare shall include the amount measured at the meter plus 1.71 mmcf/yr to account for the pilot and purge gas that is not measured by the low pressure flare meter. The natural gas consumption recorded at the high pressure flare shall include the amount measured at the meter plus 1.08 mmcf/yr to account for the pilot and purge gas that is not measured by the high pressure flare meter. (Rule 29)

3. Each flare shall be equipped and maintained with a continuous pilot or autoignition system to ensure combustion disposal of all excess produced or recovered gases. (Rule 71.1)

4. Permittee shall test the flare's ignition system monthly and shall maintain a monthly record of the flare's ignition system tests and maintenance activities, including the test date and operator's initials. (Rule 71.1)

5. The permittee shall maintain monthly and rolling twelve month records of the total volume (MMCF or MCF) of gas combusted in each flare. The rolling twelve month records for the low pressure flare shall consist of a rolling twelve month record of the volume recorded in the flare meter plus 1.71 mmcf/yr to account for the pilot and purge gas that is not measured by the low pressure flare meter. The rolling twelve month records for the high pressure flare shall consist of a rolling twelve month record of the volume recorded in the flare meter plus 1.08 mmcf/yr to account for the pilot and purge gas that is not measured by the high pressure flare meter. Monthly and twelve month rolling records shall be maintained for total flare usage and for planned flaring events (non-emergency use). Emergency usage and planned flaring are defined above. The permittee shall maintain records which differentiate between emergency use and planned flaring events. (Rule 29)

Ventura County Air Pollution Control District
Additional Permit Requirements
7.07 Sqft Deck Drain Pit (T-21)

Rule 29, "Conditions on Permits"

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 06/08/93, Federally-Enforceable

For OCS sources, conditions applied pursuant to Rule 29 are federally enforceable.

Applicability:

This attachment serves to address the additional requirement that applies to the 7.07 square foot Deck Drain Pit (T-21) located on Platform Gail. This requirement is in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The 7.07 sqft Deck Drain Pit (T-21) is exempt from permit and APCD Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars", because the function of the pit is to act as a containment berm. Pursuant to the definitions in APCD Rule 71, "Crude Oil and Reactive Organic Compound Liquids", a containment berm shall not be considered a pit. (Rules 29 and 71.4)

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Ventura County Air Pollution Control District
Additional Permit Requirements
Detroit Diesel Backup Generator

Rule 29, "Conditions on Permits"

For OCS sources, conditions applied pursuant to Rule 29 are federally enforceable.

Applicability:

This attachment serves to address an additional requirement that applies to the 1300 BHP Detroit Diesel Backup Electrical Generator (G-04) located on Platform Gail. This requirement is in addition to any other specific or general requirements referenced in this permit and serves to enforce this source's permitted emissions.

Conditions:

1. The 1300 BHP Detroit Diesel Model 16V-1491TI diesel fired backup electricity generating engine shall only be operated when the three 4.0 MW Allison turbines cannot operate due to mechanical failure. However, the Detroit Diesel backup engine may be fired simultaneously with the turbines during following situations:

    a. Startup or shutdown transition periods which shall not exceed one (1) hour.
    b. Routine maintenance on the 1300 BHP Detroit Diesel Model 16V-1491TI backup engine.

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9. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Reissuance Application, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

Ventura County Air Pollution Control District
Rule 50 Applicable Requirements
Opacity

Rule 50, "Opacity"
Adopted 04/13/04, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this stationary source.

Conditions:

1. Pursuant to Rule 50.A, permittee shall not discharge into the atmosphere from any single source whatsoever any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.

2. Permittee shall perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.

3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9, or any other appropriate test method as approved in writing by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

4. Upon District request, opacity shall be determined during routine surveillance and during the annual compliance certification by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

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Ventura County Air Pollution Control District
Rule 54.B.1 Applicable Requirements
Sulfur Compounds - Sulfur Emissions at Point of Discharge - OCS

Rule 54, "Sulfur Compounds"
Adopted 06/14/94, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this OCS (Outer Continental Shelf) stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54.B.1 for sulfur emissions at the point of discharge and includes the exemptions of Rule 54 for the unplanned burning of gas for emergency or safety concerns and for the planned burning of gas.

Conditions:

1. Pursuant to Rule 54.B.1.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume from any combustion operation, calculated as sulfur dioxide (SO_2) by volume at the point of discharge.

2. Pursuant to Rule 54.B.1.b, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 500 ppm by volume from any other operation, calculated as sulfur dioxide (SO_2) by volume at the point of discharge.

3. Pursuant to Rule 54.C.1 and 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the unplanned burning of gas for emergency or safety concerns, or to the planned burning of gas, provided that all the conditions and requirements of Rule 54.C.1 for unplanned flaring, and Rule 54.C.2 for planned flaring events, have been met. For unplanned flaring, Rule 54.C.1 requires notification, recordkeeping, and reporting as detailed below. For planned flaring events, Rule 54.C.2 requires notification, a planned flaring management plan, recordkeeping, excess emissions fees, and reporting as detailed below.

4. Pursuant to Rule 54.C.1, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the unplanned burning of gas for emergency or safety concerns provided all of the conditions of Rule 54.C.1 have been met. These include, but are not limited to, the following conditions:

    a. Permittee shall maintain records or logs of each flaring event as required by Rule 54.C.1.d.

b. Pursuant to Rule 54.C.1.f, the unplanned flaring event shall not exceed 24 hours in duration. If the flaring event exceeds one hour in duration, the operator shall:

1. Notify the District Enforcement Section as soon as reasonably possible, but no later than four hours after its detection by the operator.

2. Within one week after the flaring event, submit a written report to the District Enforcement Section which contains the records required by Rule 54.C.1.d, an estimate of the sulfur emissions, and pictures or descriptions of the equipment or controls that failed.

5. Pursuant to Rule 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the planned burning of gas provided all of the conditions of Rule 54.C.2 have been met. These include, but are not limited to, the following conditions:

a. Permittee shall provide a 72 hour written notification to the District Enforcement Section as required by Rule 54.C.2.a.

b. Permittee shall have a planned flare management plan in place and approved by the District Enforcement Section as required by Rule 54.C.2.b.

c. Permittee shall maintain records of the date, time, duration, flare volume and estimated sulfur emissions (as pounds of SO_2) during the entire flaring event as required by Rule 54.C.2.c.

d. Pursuant to Rule 54.C.2.d, permittee shall notify the District Enforcement Section in writing when work is completed. The notice shall include all updated information from the 72 hour notification as detailed in Rule 54.C.2.a.

e. Pursuant to Rule 54.C.2.f, permittee shall provide a written report of excess emissions to the District Enforcement Section no later than 15 days after the end of each calendar year. Permittee shall pay a fee pursuant to APCD Rule 42.N for any excess emissions of SO_2.

6. Permittee shall maintain a representative fuel analysis or exhaust analysis to ensure that compliance with Rule 54.B.1 is being maintained. This analysis shall be provided to the District upon request.

7. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-94 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

Ventura County Air Pollution Control District
Rule 54.B.2 Applicable Requirements
Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level - OCS

Rule 54, "Sulfur Compounds"
Adopted 06/14/94, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this OCS (Outer Continental Shelf) stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54.B.2 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source and includes the exemptions of Rule 54 for the unplanned burning of gas for emergency or safety concerns and for the planned burning of gas.

Conditions:

1. Pursuant to Rule 54.B.2, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.

2. Pursuant to Rule 54.C.1 and 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the unplanned burning of gas for emergency or safety concerns, or to the planned burning of gas, provided that all the conditions and requirements of Rule 54.C.1 for unplanned flaring, and Rule 54.C.2 for planned flaring events, have been met. For unplanned flaring, Rule 54.C.1 requires notification, recordkeeping, and reporting as detailed below. For planned flaring events, Rule 54.C.2 requires notification, a planned flaring management plan, recordkeeping, excess emissions fees, and reporting as detailed below.

3. Pursuant to Rule 54.C.1, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the unplanned burning of gas for emergency or safety concerns provided all of the conditions of Rule 54.C.1 have been met. These include, but are not limited to, the following conditions:

    a. Permittee shall maintain records or logs of each flaring event as required by Rule 54.C.1.d.

    b. Pursuant to Rule 54.C.1.f, the unplanned flaring event shall not exceed 24 hours in duration. If the flaring event exceeds one hour in duration, the operator shall:

1. Notify the District Enforcement Section as soon as reasonably possible, but no later than four hours after its detection by the operator.

2. Within one week after the flaring event, submit a written report to the District Enforcement Section which contains the records required by Rule 54.C.1.d, an estimate of the sulfur emissions, and pictures or descriptions of the equipment or controls that failed.

4. Pursuant to Rule 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the planned burning of gas provided all of the conditions of Rule 54.C.2 have been met. These include, but are not limited to, the following conditions:

   a. Permittee shall provide a 72 hour written notification to the District Enforcement Section as required by Rule 54.C.2.a.

   b. Permittee shall have a planned flare management plan in place and approved by the District Enforcement Section as required by Rule 54.C.2.b.

   c. Permittee shall maintain records of the date, time, duration, flare volume and estimated sulfur emissions (as pounds of SO_2) during the entire flaring event as required by Rule 54.C.2.c.

   d. Pursuant to Rule 54.C.2.d, permittee shall notify the District Enforcement Section in writing when work is completed. The notice shall include all updated information from the 72 hour notification as detailed in Rule 54.C.2.a.

   e. Pursuant to Rule 54.C.2.f, permittee shall provide a written report of excess emissions to the District Enforcement Section no later than 15 days after the end of each calendar year. Permittee shall pay a fee pursuant to APCD Rule 42.N for any excess emissions of SO_2.

5. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54.B.2 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.

6. Upon District request, pursuant to Rule 54.D.2, ground or sea level concentrations of SO_2 shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide with the following amendments:

   a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to

within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.

b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements," EPA/600/4-90/003.

c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

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Ventura County Air Pollution Control District
Rule 57.1 Applicable Requirements
Particulate Matter Emissions From Fuel Burning Equipment

Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
Adopted 01/11/05, Federally-Enforceable

Applicability:

This attachment applies to fuel burning equipment such as boilers, steam generators, process heaters, water heaters, space heaters, flares, and gas turbines. This attachment does not apply to internal combustion engines, jet engine test stands and rocket engine test stands, and rocket propellant testing devices and rocket fuel testing devices. This attachment also does not apply to exhaust gas streams containing particulate matter that was not generated by the combustion of fuel; such exhaust gas streams are subject to Rule 52 and Rule 53.

Conditions:

1. Pursuant to Section B of Rule 57.1, emissions of particulate matter shall not exceed 0.12 pounds per million BTU of fuel input.

   Particulate matter is defined as any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. Standard conditions are: a gas temperature of 68 degrees Fahrenheit (20 degrees Celsius) and a gas pressure of 14.7 pounds per square inch (760 mm. Hg) absolute.

2. Upon request of the District Compliance Division, compliance shall be determined by independent source test using CARB Method 5. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. Any other appropriate test method may be used with prior written approval by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

3. Periodic monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the Rule 57.B District analysis dated December 3, 1997 is sufficient.

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Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Gaseous Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuels. Rule 64 shall not apply to any flare gas combustion, where no useful energy is produced and which is subject to Rule 54, "Sulfur Compounds".

Conditions:

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.

2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

   Alternatively, when measuring the sulfur content of landfill or oilfield gaseous fuel, permittee may use the colormetric method ASTM D 4810-88 (Reapproved 1994) or the ASTM D4084-94 (Lead Acetate Reaction Rate Method) and may assume that the hydrogen sulfide content of the fuel gas adequately represents the total sulfur content. However, if the sulfur content as measured by ASTM D4810-88 or ASTM D4084-94 equals or exceeds 200 ppmv, then only South Coast AQMD Method 307-94 or ASTM D1072-90 (1994) shall be used to determine compliance.

   The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis may be used subject to the verification of the dilution ratio.

Permittee may use the colormetric method ASTM D 4810-88 (Reapproved 1994) for the measurement of the sulfur content of gaseous fuels other than landfill or oilfield gas only if written approval has been granted by the District and by US EPA.

4. Monitoring of the sulfur content of landfill or oilfield gaseous fuel by the permittee shall be at least quarterly if any of the following conditions apply:

   a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.

   b. A stationary source is new.

   c. The permittee has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.

   An operator may have the sulfur content of landfill or oilfield gaseous fuel monitored annually only, instead of quarterly, by satisfying the following provisions:

   a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and

   b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including monitoring reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the District is received by the operator.

   This annual fuel analysis, and the quarterly analyses if applicable, shall be maintained at the facility and a copy of the annual analysis shall be provided to the District with the annual compliance certification.

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Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Liquid Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting liquid fuels. This attachment does not apply to any combustion emission unit with sulfur emission controls.

Conditions:

1. Pursuant to Rule 64, no person shall burn any liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.

2. If only ARB-quality reformulated gasoline or ARB-certified diesel fuel is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than ARB-quality reformulated gasoline or ARB-certified diesel fuel is being combusted, for each liquid fuel delivery permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98, to ensure that compliance with Rule 64 is being maintained. For liquid fuels, operators of electric power generation units may use the sampling and analysis methods prescribed in Code of Federal Regulations 40CFR Part 75 Appendix D.2.2. The fuel supplier's certification may be provided once for each purchase lot, if records are kept of the purchase lot number of each delivery.

   The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

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Ventura County Air Pollution Control District
Rule 71.1.C Applicable Requirements
Crude Oil Production and Separation - Produced Gas

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to the emissions of produced gas from equipment used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production unit prior to custody transfer. Specifically, this attachment applies to gas collection systems that are hard-piped and closed systems that direct all produced gas to a fuel or sales gas system or to a flare.

Conditions:

1. Pursuant to Rule 71.1.C.1, the emissions of produced gas shall be controlled at all times using a properly maintained and operated closed system that directs all gas, except gas used in a tank battery vapor recovery system, to one of the following:

   a. A fuel or sales gas system
   b. A flare that combusts reactive organic compounds

2. Pursuant to Rule 71.1.C.2, the provisions of Rule 71.1.C.1 shall not apply to wells which are undergoing routine maintenance, or to exploratory wells (during the first two weeks of production) if the composition of the produced gas is unknown (i.e., new reservoir) and there are no existing gas handling systems within 150 feet of the well.

3. Permittee shall annually certify the produced gas collection system to ensure that compliance with Rules 71.1.C.1 is being maintained. This annual certification shall include a visual inspection assuring that the produced gas collection system is a closed system.

4. If a flare is used to control the produced gas, permittee shall inspect the flare on a quarterly basis to ensure that it is operating properly. A record of these inspections shall be maintained at the facility and shall be submitted to the District upon request.

5. The gas collection system's gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the gas collection system ensures compliance with the maintenance requirements of Rule 71.1.C.1.

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Ventura County Air Pollution Control District
Rule 71.4.B.1 Applicable Requirements
First Stage Sump Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 06/08/93, Federally-Enforceable

Applicability:

This attachment applies to any first stage production sump at this stationary source. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system. A sump is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand, or other material in petroleum production operations".

Conditions:

1. Pursuant to Rule 71.4.B.1, no person shall install, maintain, or operate a first stage production sump. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system.

2. In order to ensure that compliance with Rule 71.4.B.1 is being maintained, permittee shall annually certify that there are no first stage production sumps at the facility.

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Ventura County Air Pollution Control District
Rule 71.4.B.3 Applicable Requirements
Well Cellar Storage Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"
Adopted 06/08/93, Federally Enforceable

Applicability:

This attachment applies to any well cellar at this stationary source. This attachment addresses the requirements of Rule 71.4.B.3 which prohibits the storage of crude oil or petroleum material in a well cellar. Rule 71.4 applies to well cellars at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored.

A well cellar is a lined or unlined area around one or more oil wells, allowing access to the wellhead components for servicing and/or installation of blowout prevention equipment.

Conditions:

1. Pursuant to Rule 71.4.B.3, no person shall store crude oil or petroleum material in a well cellar except during periods of equipment maintenance or well workover. In no case shall storage occur for more than five (5) calendar days.

2. Pursuant to Rule 71.4.C, the provisions of Rule 71.4 shall not apply to well cellars used in an emergency, if clean-up procedures are implemented within 24 hours after each emergency occurrence and if clean-up procedures are completed within fifteen (15) calendar days.

3. Permittee shall perform routine surveillance and visual inspections of well cellars to ensure that compliance with Rule 71.4.B.3 is being maintained.

4. Pursuant to Rule 71.4.D.2, any person storing crude oil in a well cellar during periods of equipment maintenance or well workover shall maintain records, which may include but are not limited to, workover invoice documents, indicating the date(s) the material was stored in the well cellar or the date(s) of workover activity. These records shall be submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.6 Applicable Requirements
Surface Cleaning and Degreasing

Rule 74.6, "Surface Cleaning and Degreasing"
Adopted 11/11/03, Federally-Enforceable

Applicability:

This attachment applies to all solvent cleaning activities at this stationary source, except those activities listed in Condition No. 11 that are exempt pursuant to Section E of Rule 74.6. This attachment does not apply to substrate surface preparation regulated by other APCD surface coating, adhesive, ink, resin, and solvent rules. "Solvent" is defined as any ROC-containing liquid used to perform solvent cleaning. "Solvent cleaning" is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, uncured resins, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

This attachment also contains requirements, pursuant to Rule 74.6, for cold cleaners. A cold cleaner is defined in Rule 74.6 as any batch operated equipment designed to contain liquid solvent that is operated below the solvent's boiling point to carry out solvent cleaning operations. A specific type of cold cleaner is a "remote reservoir cold cleaner" which is a device in which solvent is moved through a sink-like work area for cleaning parts and drains immediately, without forming a pool, through a single drain hole less than 100 square centimeters (15.5 square inches) in area into an enclosed container that is not accessible for soaking parts. The freeboard height for remote reservoir cold cleaners is the distance from the top of the solvent drain to the top of the tank.

This attachment does not apply to solvent cleaning where an emission control system is used pursuant to Rule 74.6.B.5 or where an alternative cleaning system is used pursuant to Rule 74.6.B.6. Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, unless exempted by Rule 74.6.E, such solvents are required to comply with Rule 74.6.

Conditions:

1. Pursuant to Rule 74.6.B.1, no person shall perform solvent cleaning using solvent that exceeds the following limits:

    a. Solvents used for application equipment cleanup, and all other cleanup of uncured coatings, adhesives, inks, or resins, shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.

b. Solvents used for cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.

c. Solvents used for cleaning for purposes other than those listed in (a) and (b) above shall not exceed an ROC content of 25 grams per liter, as applied.

2. Pursuant to Rule 74.6.B.2, no person shall perform solvent cleaning using a solvent with an ROC content greater than 25 grams per liter unless one of the following cleaning devices or methods is used:

a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;

b. Non-atomized solvent flow, dip, or flush method where pooling on surfaces being cleaned is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;

If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operating requirements of Condition Nos. 8, 9, and 10 of this attachment (Sections C and D of Rule 74.6) shall be used to comply with this requirement.

c. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;

d. A properly used enclosed gun washer or low emission spray gun cleaner.

3. Pursuant to Rule 74.6.B.3.a, no person shall allow liquid cleaning solvent to leak from any equipment or container.

4. Pursuant to Rule 74.6.B.3.b, no person shall specify, solicit, supply, or require any cleaning solvent or solvent cleaning equipment intended for uses governed by Rule 74.6 if such use would violate Rule 74.6. This prohibition applies to all written and oral contracts under which solvent cleaning operations subject to Rule 74.6 are to be conducted at any location in Ventura County.

5. Pursuant to Rule 74.6.B.3.c, no person shall use more than one gallon per week of

solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these solvents, in a total concentration greater than 5 percent by weight, for cold cleaning except in a cold cleaner operated in accordance with National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards). Any person that uses the above solvent in quantities less than one gallon per week shall maintain records of the volume and formulation of such solvent on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

6. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers that shall be kept closed at all times except when filling or emptying.

7. Pursuant to Rule 74.6.B.4.b, waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.

8. Pursuant to Rule 74.6.C.1, all cold cleaners, except remote reservoir cold cleaners, shall be equipped with the following devices:

   a. A drying rack suspended above the solvent, or other facility for draining cleaned parts such that the drained solvent is returned to the cleaner.

   b. A cover that prevents the solvent from evaporating when not processing work in the cleaner. If high volatility solvent is used, the cover must be a sliding, rolling, or guillotine (bi-parting) type that is designed to easily open and close, or it must be designed to be easily operated with one hand. A high volatility solvent is an unheated solvent with an ROC composite partial pressure of greater than 2 mmHg @ 20^{o}C.

   c. A freeboard height of at least 6 inches (15.2 centimeters), if low volatility solvent is used. A low volatility solvent is an unheated solvent with an ROC composite partial pressure of 2 mmHg or less @ 20^{o}C.

   d. At least one of the following control devices, if high volatility solvent is used:

      1. A freeboard height such that the freeboard ratio is at least 0.75.
      2. A water cover if the solvent is insoluble in and heavier than water.

   e. A permanent conspicuous mark locating the maximum allowable solvent level that conforms with the applicable freeboard height requirement in Condition No. 8.c or 8.d.1.

f. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.

9. Pursuant to Rule 74.6.C.2, remote reservoir cold cleaners shall be equipped with the following devices:

a. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.

b. A sink-like work area that is sloped sufficiently towards the drain to preclude pooling of solvent.

c. A single drain hole, less than 100 square centimeters (15.5 square inches) in area, for the solvent to flow from the sink into the enclosed reservoir.

d. A freeboard height of at least 6 inches (15.2 centimeters).

e. A cover for the drain when no work is being processed in the cleaner and high volatility solvent is used. If low volatility solvent is used, a cover is not required.

10. Pursuant to Rule 74.6.D, any person who operates a cold cleaner shall conform to the following operating requirements:

a. The operator shall drain cleaned parts of all solvent until dripping ceases to ensure that the drained solvent is returned to the cleaner.

b. Solvent agitation, where necessary, shall be achieved using pump recirculation, a mixer, or ultrasonics. Air agitation shall not be used.

c. If a solvent flow is utilized, only a solid fluid stream (not a fine, atomized, or shower type spray) shall be used.

d. The pressure of the solvent flow system shall be such that liquid solvent does not splash outside the container.

e. No person shall remove or open any required device designed to cover the solvent unless work is being processed in the cleaner or maintenance is being performed on the cleaner.

f. The cleaning equipment and emission control equipment shall be operated and maintained in proper working order.

g. The cleaning of porous or absorbent materials such as cloth, leather, wood, or rope is prohibited. This provision shall not apply to paper gaskets or paper filters.

11. Pursuant to Rule 74.6.E.1, Rule 74.6 (all requirements of this permit attachment) shall not apply to:

a. Cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied. A "Clean Air Solvent" is a solvent certified by the South Coast Air Quality Management District as a Clean Air Solvent.

b. The use of up to 160 fluid ounces of non-refillable aerosol cleaning products per day, per facility.

c. Janitorial cleaning including graffiti removal.

d. Cleaning carried out in vapor degreasers or motion picture film cleaning equipment.

e. Any cleaning device or mechanism regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).

f. Cleaning operations subject to any of the following rules:

Rule 74.3, Paper, Fabric and Film Coating Operations
Rule 74.5.1, Petroleum Solvent Dry Cleaning
Rule 74.5.2, Synthetic Solvent Dry Cleaning
Rule 74.19, Graphic Arts Operations
Rule 74.19.1, Screen Printing Operations
Rule 74.21, Semiconductor Manufacturing

g. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, unglueing), cured ink, or cured resin.

h. The use of solvent for purposes other than solvent cleaning activities.

12. Pursuant to Rule 74.6.E.2, Rule 74.6.B.1 (Condition No. 1 of this attachment) shall not apply to:

a. Cleaning operations required to comply with any ROC content and/or composite vapor pressure limit in any of the following rules:

Rule 74.12, Surface Coating of Metal Parts and Products
Rule 74.13, Aerospace Assembly and Component Manufacturing Operations
Rule 74.14, Polyester Resin Material Operations
Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations
Rule 74.20, Adhesives and Sealants

Rule 74.24, Marine Coating Operations
Rule 74.24.1, Pleasure Craft Coating Operations
Rule 74.30, Wood Products Coatings

b. Cleaning of ultraviolet lamps used to cure ultraviolet inks coatings, adhesives or resins.

c. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.

d. Cleaning conducted in laboratory tests and analyses including quality assurance/quality control applications, or bench scale or short-term (less than 2 years) research and development programs.

e. Removal of elemental sodium from the inside of pipes and lines.

f. Cleaning of mold release compounds from molds.

g. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.

h. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine.

i. Cleaning of paper gaskets.

j. Cleaning of clutch assemblies where rubber is bonded to metal by means of an adhesive.

k. Cleaning of hydraulic actuating fluid from filters and filter housings.

l. Removal of explosive materials and constituents from equipment associated with manufacturing, testing or developing explosives.

m. Manufacturing cleaning of nuts and bolts designed for automotive racing applications, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.

n. Cleaning of precision–lapped mechanical seals in pumps that handle liquefied gasses, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.

o. Facilitywide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall maintain records of the volume and formulation of non-compliant solvent used on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

13. Pursuant to Rule 74.6.E.3, Rule 74.6 Sections B.1 and B.2 (Condition Nos. 1 and 2 of this attachment) shall not apply to aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l or less, as applied.

14. Pursuant to Rule 74.6.F, the permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:

a. Solvent name and manufacturer's description.

b. All intended uses of the solvent at the facility, classified as follows:

1. Cleanup, including application equipment cleaning, or
2. Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or
3. Solvent used pursuant to an exemption in Rule 74.6.E (specify the exemption claimed).

c. The ROC content in units of grams per liter of material (and ROC composite partial pressure in units of mm Hg @ 20C, if applicable) of the solvent.

d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be made available to District personnel upon request.

15. Permittee shall maintain the above records and perform routine surveillance of the applicable solvent cleaning activities to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:

a. Pursuant to Rule 74.6.G.1, the ROC content of materials shall be determined by EPA Test Method 24 (40 CFR Part 60, Appendix A).

b. Pursuant to Rule 74.6.G.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.

c. Pursuant to Rule 74.6.G.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.

d. Pursuant to Rule 74.6.G.6, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.

e. Pursuant to Rule 74.6.G.7, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.G.5.

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Ventura County Air Pollution Control District
Rule 74.10 Applicable Requirements
Components at Crude Oil and Natural Gas Production and Processing Facilities

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally Enforceable

Applicability:

This attachment applies to the crude oil and gas production facilities, pipeline transfer stations, and to natural gas processing facilities, at this stationary source. This attachment summarizes the fugitive leak and leak inspection requirements of Rule 74.10.

A crude oil and gas production facility is defined as an onshore or offshore facility at which crude petroleum and natural gas production and handling are conducted, as defined in the SIC Code as Industry No. 1311, Crude Petroleum and Natural Gas. A pipeline transfer station is defined as a facility that handles the transfer or storage of crude oil in pipelines. A natural gas processing facility is defined as a facility engaged in the separation of natural gas liquids from field gas and/or fractionation of the liquids into natural gas products, such as ethane, propane, butane, and natural gasoline. Excluded from the definition are compressor stations, dehydration units, sweetening units, field treatment, underground storage facilities, liquefied natural gas units, and field gas gathering systems unless these facilities are located at a natural gas processing plant. This attachment does not apply to petroleum refineries.

Conditions:

1. Pursuant to Rule 74.10.B, the operator shall identify all leaking components that cannot be immediately repaired. This identification shall consist of readily visible labels, tags, or other such system approved by the APCO, in writing, that enables the District and the operator to locate and identify each leaking component. Identification tags and labels shall remain visible for at least one year from the date attached.

   As detailed in Rule 74.10.K.14, a leak is defined as any major gas leak, minor gas leak, major liquid leak or minor liquid leak. A leak is not a gaseous emission from a pneumatic control valve if it occurs when the valve is in the act of opening or closing. As detailed in Rule 74.10.K.3, a component is defined as any valve, stuffing box, dump lever arm, open ended line, fitting, pump seal, compressor seal, pressure relief valve, diaphragm, hatch, sight glass or meter. As detailed in Rule 74.10.K.16, a leak repair is any corrective action taken for the purposes of reducing a component leak to the lowest achievable level or at least below 1,000 ppmv for gas leaks and three drops per minute for liquid leaks using the best modern practices.

2. Pursuant to Rule 74.10.C.1, hatches shall be closed at all times except during sampling, adding of process material through the hatch, or attended maintenance operations.

3. Pursuant to Rule 74.10.C.2, no person shall use a component that emits a major gas leak, major liquid leak or minor liquid leak and the applicable maximum leak threshold for that component category, as listed in Attachment 1 of Rule 74.10, has been exceeded at the facility in any calendar quarter. The provisions of Rule 74.10.C.2 shall not apply to components that are tagged and repaired in accordance with Rules 74.10.D and 74.10.F.

   For the purpose of complying with the operating requirements in Rule 74.10.C.2, any fugitive emissions leak originating at a tank seam, broken pipe or any other nondesigned opening in a process unit shall be considered an "other component" leak for the purpose of Attachment 1 of Rule 74.10.

   A major gas leak, major liquid leak, and minor liquid leak are defined in Subsections K.17, K.18, and K.20 of Rule 74.10, respectively.

4. Pursuant to Rule 74.10.D.1, at natural gas processing plants, operators shall inspect with or without instrumentation all accessible operating pump seals, compressor seals, and pressure relief valves in service for leaks or indications of leaks once during every operating shift or every eight-hour period, whichever is greater.

5. Pursuant to Rule 74.10.D.2, at oil and gas production facilities and pipeline transfer stations, operators shall inspect with or without instrumentation all operating pump seals, compressor seals, pressure relief valves in service, and polished rod stuffing boxes for leaks or indications of leaks as follows:

   a. Inspection frequency at manned facilities shall be at least once per day except when operators do not report to work at a facility at any time during that day.

   b. Inspection frequency at unmanned facilities shall be at least once per week.

6. Pursuant to Rule 74.10.D.3, any gaseous leaks or indications of gaseous leaks discovered by inspection, that cannot be immediately repaired, shall be measured using EPA Method 21. The operator shall perform this leak measurement as follows:

   a. For leaks detected during normal business hours, the leak measurement shall be performed as soon as feasible but no later than 24 hours after detection. If this 24 hour deadline occurs on a weekend or holiday, then the deadline is shifted to the end of the next normal business day.

   b. For leaks detected during holidays, weekends or after business hours, the leak measurement shall be performed as soon as feasible but no later than the end of

the next normal business day.

7. Pursuant to Rule 74.10.D.4, immediately after being placed into service, an operator shall inspect all new, replaced or repaired fittings, including flanges and threaded connections, for leaks using EPA Method 21.

8. Pursuant to Rule 74.10.D.5, operators shall inspect all components, except for the following, at least every calendar quarter for gaseous leaks using EPA Method 21.

   a. Inaccessible components or unsafe to monitor components shall be inspected for leaks by the operator at least annually using EPA Method 21.

   b. Threaded connections and flanges shall be inspected for leaks by the operator using EPA Method 21 annually, unless the operator has designated them in the Operator Management Plan as exempt from all inspection requirements and subject to a zero leak threshold.

9. Pursuant to Rule 74.10.D.6, a pressure relief valve shall be inspected using EPA Method 21 within 3 calendar days after every known pressure release.

10. Pursuant to Rule 74.10.D.7, upon detection, operators shall affix a visible, weatherproof tag to all leaking components awaiting repair. The tag shall remain affixed until the component is repaired free of leaks as shown by re-inspection.

    If the leak is gaseous, the operator shall include the following on the tag: date and time of leak detection, date and time of leak measurement; and the concentration (ppmv) measured using EPA Method 21.

    If the leak is liquid, the operator shall include the following on the tag: date and time of leak detection; and whether leak is minor or major.

    A tag may also be some other system approved in writing by the APCO that demonstrates to District personnel that the operator has detected a component leak awaiting repair and contains all of the information required to be on tags by Rule 74.10.D.7.

11. Pursuant to Rule 74.10.D.8, notwithstanding the requirements of Rule 74.10.D.5, operators may inspect components annually instead of quarterly at a facility by satisfying all the following provisions, except that compressor seals, pressure relief valves, polished rod stuffing boxes, and pump seals shall not be eligible for this reduction in inspection frequency:

    a. During 4 consecutive calendar quarters, successfully operate and maintain all components at the facility so that no more than 0.5 percent of the total

components inspected, excluding polished rod stuffing boxes, have liquid leaks or major gas leaks that have not been immediately repaired.

b. A Notice of Violation from the District for a violation of Rule 74.10.C.2 was not received by the operator for the facility during the previous twelve months.

c. Submit a written request to the District for a reduction in inspection frequency. This request shall contain backup documentation including inspection reports that demonstrates that the above performance level in Rule 74.10.D.8.a has been achieved. Requests for a reduction in inspection frequency are not effective until written approval by the APCO is received by the operator.

12. Pursuant to Rule 74.10.D.9, an annual inspection frequency approved in Rule 74.10.D.8 shall revert to the inspection frequency specified in Rule 74.10.D.5 should the sum of liquid leaks and major gas leaks, not including leaks from polished rod stuffing boxes, exceed 0.5 percent of the total components inspected per inspection period or should the operator receive a Notice of Violation from the District for violation of Rule 74.10.C.2 for that facility.

13. Pursuant to Rule 74.10.E.1, each operator shall submit an Operator Management Plan to the APCO for approval. If the APCO fails to respond to the Plan in writing within 90 days after it has been received, then it shall be deemed approved. No provision in the Plan, approved or not, shall conflict with or take precedence over any provision of this rule. The Plan shall identify any component exempt from this rule or part of this rule, and describe the procedures which the operator intends to use to comply with the requirements of this rule. The Plan shall include:

a. Establishment of a data base of every leaking component that cannot be immediately repaired. The following parameters shall be included:

1) Identification number, name or code.

2) Component type, process unit and location.

3) Dates found leaking and repair description for each leak found.

This identification provision is for inspection, repair, replacement and recordkeeping purposes.

b. Identification of critical process units.

c. Identification of components for which exemption from Rule 74.10 is being claimed under Rule 74.10.G.1. Gaseous streams and liquid streams, exempted by

Rule 74.10, Subsections G.1.a, G.1.b, G.1.c, or G.1.e shall be verified by analysis of the ROC concentrations, and the results of such analyses shall be included.

d. Identification of liquid streams or components for which exemption is being claimed from the operator inspection requirements under Rule 74.10.G.3. The results of any testing used to qualify a stream for exemption shall be included.

e. Whether flanges or threaded fittings are exempt from all inspection requirements and subject to a zero leak threshold or whether flanges or threaded fittings are subject to annual inspection requirements and a one percent leak threshold as specified in Attachment 1 of Rule 74.10.

f. The inspection schedule to be followed.

g. Identification and description of any known hazard which may affect the safety of APCD personnel.

h. Identification of unmanned production facilities, if applicable.

14. Pursuant to Rule 74.10.E.2, the operator shall be required, upon written request by the APCO, to re-qualify, by analysis, the exemption(s) from the rule or part of the rule (Rule 74.10.G.1 and 74.10.G.3) if the exemption(s) may no longer be valid based on the changed composition of the process stream. The results of that analysis and any modification to the Plan shall be submitted to the District within 90 calendar days after receipt of the District request.

15. Pursuant to Rule 74.10.E.3, if the exempt status of a component is affected by a revision to Rule 74.10, then the Plan shall be modified accordingly by June 10, 1998.

16. Pursuant to Rule 74.10.E.4, existing operator management plans shall be updated no later than September 10, 1998, to include any provision that is needed to show compliance with Rule 74.10.

17. Pursuant to Rule 74.10.E.5, beginning September 10, 1998, each operator shall submit to the APCO, for approval in writing, an annual report to update the Operator Management Plan by no later than January 30 of each year. This report shall include any changes to exemptions, inspection schedule, or any other changes to the inspection and maintenance program. If no changes to the Plan have occurred over the past 12 months, then the operator shall indicate this in the annual report.

    If the APCO fails to respond to the Plan update in writing within 90 days after it has been received, then it shall be deemed approved. No provision in the Plan, approved or not, shall conflict with or take precedence over any provision of Rule 74.10.

18. Pursuant to Rule 74.10.F.1, the operator shall minimize all component leaks immediately if feasible but no later than 1 hour following detection during normal business hours. Component leaks detected during holidays, weekends and after business hours shall be immediately minimized if feasible but not later than the next normal business day.

19. Pursuant to Rule 74.10.F.2, any noncritical component found leaking shall be replaced or repaired to a leak free condition, within the time periods in Table 1 of Rule 74.10. For gaseous leaks, the repair period shall start at the time of leak measurement. For liquid leaks, the repair period shall start at the time of leak detection. If the Table 1 deadline for repairing any major gas leak or any liquid leak falls on a Saturday, Sunday or holiday, then the deadline shall be shifted to the next normal business day.

20. Pursuant to Rule 74.10.F.3, the operator shall re-inspect repaired or replaced components for leaks as soon as practicable using EPA Method 21, but not later than one calendar month after the date on which the component is repaired.

21. Pursuant to Rule 74.10.F.4, any component leak identified by District personnel shall be repaired and inspected as required by Rule 74.10.F.

22. Pursuant to Rule 74.10.F.5, any open-ended line found to be leaking shall be sealed with a blind flange, cap, plug, or a second closed valve at all times except during operations requiring process fluid flow through the open-ended line or valve. If a second closed valve is used, the process side valve shall be closed first, after the completion of any operations requiring flow through the open-ended valve.

23. Pursuant to Rule 74.10.F.6, for major gas leaks (>50,000 ppm) or major liquid leaks from any critical compressor seal, pump seal, pressure relief valve or valve that cannot be repaired within the repair periods set forth in Table 1 of Rule 74.10, the operator shall replace or retrofit the leaking component with Best Available Control Technology (BACT) equipment, as approved by the APCO in writing, within one year from the date of leak detection, or during the next critical process unit shutdown, whichever occurs first.

    For gas leaks less than or equal to 50,000 ppm or minor liquid leaks from critical components, or for leaks from critical components other than compressor seals, pump seals, pressure relief valves or valves, the owner or operator shall successfully repair or replace all leaking components within one year from leak detection or during the next critical process unit shutdown, whichever occurs first.

    The operator shall notify the District in writing within 3 months after detecting a major gas leak (> 50,000 ppm) or major liquid leak from a critical compressor seal, pump seal, pressure relief valve, or valve if such leak cannot be repaired within the repair periods set

forth in Table 1 of Rule 74.10.

24. Pursuant to Rule 74.10.F.7, for a compressor seal, pump seal, pressure relief valve or valve that emits a total of 5 major leaks within a continuous 12 month period, the operator shall replace or retrofit the leaking component with BACT equipment, as approved by the APCO in writing, within one year from date of leak detection. The operator shall notify the District in writing within 3 months after a compressor, pump, pressure relief valve, or valve has had 5 major leaks in the previous 12 months.

25. Pursuant to Rule 74.10.G.1, the requirements of Rule 74.10 shall not apply to the following components that are verified in the Operator Management Plan:

    a. Components, not at natural gas processing plants, with gaseous streams with ROC concentrations of 10 percent, by weight or less.

    b. Components at natural gas processing plants with gaseous streams with ROC concentrations of one percent, by weight or less.

    c. Components, not at natural gas processing plants, in liquid service, with ROC concentrations of 10 percent, by weight or less.

    d. Underground components.

    e. Components exclusively handling fluids if the fluid weight evaporated is 10 percent or less at 150 degrees Celsius.

26. Pursuant to Rule 74.10.G.2, the operator inspection requirements of Rule 74.10.D shall not apply to the following components. All other requirements of this rule shall still apply.

    a. Pump seals, compressor seals, and pressure relief valves that are equipped with a closed-vent system to a vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of one of the following:

        1) A system which directs all vapors to a fuel gas system, a sales gas system, or a flare that combusts ROC.

        2) Any other system that processes all vapors and has a ROC vapor destruction or removal efficiency of at least 90 percent, by weight.

    b. One-half inch and smaller stainless steel tube fittings that have been determined to be leak-free.

c. Components in vacuum service.

d. Flanges or threaded connections that are designated in the Operator Management Plan as subject to the zero leak threshold specified in Attachment 1 of Rule 74.10.

27. Pursuant to Rule 74.10.G.3, the operator inspection requirements of Rule 74.10, Subsections D.1, D.2, D.4 and D.5 shall not apply to components that are inspected with or without instrumentation on a quarterly basis and are at oil and gas production facilities or pipeline transfer stations that handle liquids with the following properties and specified vapor recovery systems:

a. Liquid having an API gravity of 20 degrees or less after the point of primary separation;

b. Liquid having an API gravity between 20 and 30 degrees which are located either:

1) Downstream of a wellhead equipped with a casing vapor recovery system, provided that the vapor recovery system is operated at a pressure of less than 10 psig; or

2) After the point of primary separation of oil and gas, provided the separation vessel is equipped with a vapor recovery system and is operated at a pressure of less than 25 psig.

28. Pursuant to Rule 74.10.G.4, an owner or operator may petition the APCO for exemption from the replacement or retrofit requirements in Rules 74.10.F.6 and 74.10.F.7 by submitting a cost evaluation for retrofitting or replacing a compressor, pump, pressure relief valve, or valve. Each petition shall include:

a. A cost-effectiveness evaluation conducted in accordance with "BACT Cost-Effectiveness Procedures and Screening Levels for Costs," adopted by the Air Pollution Control Board on December 20, 1988. The cost analysis shall be based on the retrofit cost of the component if a retrofit is feasible. If the component cannot be retrofitted, then the following control option with the lower cost shall be used in the cost analysis:

1) Component replacement with the lowest feasible cost BACT option.

2) Enclosing the component seal and venting to a vapor recovery system.

b. Evidence of costs with written bids from vendors, published price lists, or other verifiable cost information. The potential emission reduction from the component retrofit/replacement shall be based on the ROC emissions over the previous 12

months. ROC emissions from a critical process unit shutdown shall be included if those emissions are associated with a critical leaking component. APCO-approved emission factors or source tests shall be used to quantify emissions.

29. Pursuant to Rule 74.10.H.1, any person subject to Rule 74.10 shall maintain an inspection log. The inspection log shall contain at least the following:

    a. Location, type, description, and name or code of each leaking component inspected that cannot be immediately repaired, and name of associated operating unit.

    b. For liquid leaks that cannot be immediately repaired: Date and time of leak detection and whether leak is major or minor.

    c. For gaseous leaks that cannot be immediately repaired: Date and time of leak detection, date and time of leak measurement, analyzer reading (ppmv) of the leak, and whether the leak is major or minor.

    d. Date that leak referenced in Rule 74.10.H.1.b or Rule 74.10.H.1.c is repaired to a leak-free condition, description of repair action, and date and emission level of re-check.

    e. Identification of leak as critical if the component is critical.

    f. Maintenance and calibration records of appropriate analyzer used in the EPA Method 21 measurements.

30. Pursuant to Rule 74.10.H.2, where a functional pressure relief has been detected, the operator shall record:

    a. Location, operating unit identification, and date of detection.

    b. Date of inspection of the pressure relief device after it was detected, and analyzer reading from EPA Method 21.

31. Pursuant to Rules 74.10.H.3 and 74.10.H.4, the inspection log shall be retained by the operator and shall be made available upon request to District personnel.

32. Pursuant to Rule 74.10.I.1, gaseous leaks from components shall be inspected or determined by EPA Method 21 by using an appropriate analyzer calibrated with methane. The calibration, maintenance, and operation of the appropriate analyzer shall follow the manufacturer's recommendations.

33. Pursuant to Rule 74.10.I.2, the ROC concentration, by weight, of process streams shall be measured by ASTM E168-88 (General Techniques of Infrared Qualitative Analysis), ASTM E169-87 (General Techniques of Ultraviolet Quantitative Analysis), or ASTM E260-85 (Gas Chromatography), or updated versions of these methods approved by EPA and published in the 40 CFR Part 60.

34. Pursuant to Rule 74.10.I.3, weight percentage of evaporated compounds of liquids shall be determined using ASTM Method D 86-82.

35. Pursuant to Rule 74.10.I.4, the API gravity of crude oil shall be determined using ASTM Method D287.

36. Pursuant to Rule 74.10.J, the failure of a person to meet any requirements of Rule 74.10 shall constitute a violation of Rule 74.10. Each leak exceeding the applicable maximum leak threshold in Attachment 1 of Rule 74.10 discovered by District personnel will be considered to be a violation.

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Ventura County Air Pollution Control District
Rule 74.11.1 Applicable Requirements
Rule 74.11.1, Large Water Heaters and Small Boilers

Rule 74.11.1, "Large Water Heaters and Small Boilers"
Federally Enforceable Version Adopted 09/14/99
District Enforceable Version Adopted 09/11/12

This permit attachment lists the requirements of the September 11, 2012 version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 74.11.1. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by the EPA as part of the SIP.

Applicability:

This attachment applies to all natural gas-fired water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr at this stationary source installed after January 1, 2013 and to the future installation of any such unit at this stationary source.

Conditions:

1. Pursuant to Rule 74.11.1.B.1, until January 1, 2014, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:

    a. Oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million, and

    b. The unit is certified in accordance with Rule 74.11.1.C.

2. Pursuant to Rule 74.11.1.B.2, after January 1, 2014, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:

    a. Oxides of nitrogen emissions shall not exceed 14 nanograms per joule of heat output (32.5 pounds per billion BTU), or 20 parts per million, and

    b. The unit is certified in accordance with Rule 74.11.1.C.

The oxides of nitrogen emission standard required above (Condition No. 2.a) does not apply to units specifically designed to heat swimming pools, hot tubs, or spas. For such units, oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million.

3. Pursuant to Rule 74.11.1.B.3, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than 400,000 BTU/hr and less than or equal to 1,000,000 BTU/hr that does not meet the following criteria:

   a. Oxides of nitrogen emissions shall not exceed 20 parts per million and carbon monoxide emissions shall not exceed 400 parts per million, and

   b. The unit is certified in accordance with Rule 74.11.1.C.

4. The permittee shall maintain a listing of manufacturer, brand name, model number, heat input rating, and installation date for each water heater, boiler, steam generator and process heater, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source. Permittee shall submit these identification records for all of these units to the District upon request.

5. On an annual basis, the permittee shall certify that all water heaters, boilers, steam generators and process heaters, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source are complying with Rule 74.11.1. This annual certification shall include a formal survey identifying each unit and documentation of certification status (pursuant to Rule 74.11.1.C), as required.

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Ventura County Air Pollution Control District
Rule 74.22 Applicable Requirements
Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces

Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces"
Adopted 11/09/93, Federally-Enforceable

Applicability:

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

Conditions:

1. Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gas-fired fan-type central furnace:

   a. with NOx (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)

   b. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)

2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.

3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

10. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration. Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Reissuance Application, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" or "Attachment 40CFR61.M" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
Rule 74.1 Applicable Requirements
Abrasive Blasting

Rule 74.1, "Abrasive Blasting"
Adopted 11/12/91, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

Conditions:

1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:

    a. Steel or iron shot/grit is used exclusively

    b. The item to be blasted exceeds eight feet in any dimension

    c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted

2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:

    a. Wet abrasive blasting

    b. Hydroblasting

    c. Vacuum blasting

    d. Dry blasting with California ARB certified abrasives

3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.

4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.

5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.

6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.

7. Permittee shall perform routine surveillance and visual inspections of the abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. This routine surveillance shall include assuring that operation and equipment requirements are being met, and that there are no opacity violations.

   In addition, for each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:

   a. Date of operation

   b. Type of abrasive blasting media used

   c. Identity, size, and location of item blasted

   d. Whether operation was conducted inside or outside a permanent building

   e. California ARB certifications for abrasives used

   These records shall be maintained at the facility and submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.2 Applicable Requirements
Architectural Coatings

Rule 74.2, "Architectural Coatings"
Adopted 01/12/10, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. An architectural coating is a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to nonstationary structures, such as airplanes, ships, boats, railcars and automobiles, are not considered to be architectural coatings for the purposes of this rule, nor are adhesives.

This attachment and Rule 74.2 do not apply to architectural coatings that are sold in a container with a volume of one liter (1.057 quart) or less and do not apply to any aerosol coating product.

Conditions:

1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of architectural coatings shall not exceed the following standards, as found in Table 2 of Rule 74.2.B.1, unless specifically exempted by Rule 74.2:

    a. The VOC content of flat coatings shall not exceed 100 grams per liter of coating. Effective January 1, 2012, this limit is reduced to 50 grams per liter of coating.

    b. The VOC content of nonflat coatings shall not exceed 100 grams per liter of coating.

    c. The VOC content of nonflat-high gloss coatings shall not exceed 150 grams per liter of coating.

    Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

2. Pursuant to Rule 74.2.B.1, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.

    Specifically, the VOC content of industrial maintenance coatings shall not exceed 250 grams per liter of coating.

Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

3. Pursuant to Rule 74.2.B.4, all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.

4. Pursuant to Rule 74.2.B.5, no person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in the Tables in Subsection B.1.

5. Permittee shall perform routine surveillance of the architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.

6. The VOC content of architectural coatings, along with other specified physical and chemical properties, shall be measured using the testing procedures in Rule 74.2.G.

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Ventura County Air Pollution Control District
Rule 74.16 Applicable Requirements
Oilfield Drilling Operations on Platform Gail

Rule 74.16, "Oilfield Drilling Operations"
Adopted 01/08/91, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving oilfield drilling operations on Platform Gail. Oilfield drilling operations are defined as activities powered by nonvehicular internal combustion engines for the purpose of drilling or redrilling oil wells, injection wells, or gas wells. For the purpose of Rule 74.16, drilling operations do not include any operations at any existing well where the derrick is a part of an oilwell production service unit, as defined in the California Vehicle Code. Rule 74.16 applies to drill rig engines over 50 HP including, but not limited to, engines supplying power to drawworks, rotary tables, mud pumps, mud mixers and auxiliary generators.

This attachment applies to an oil company, which Rule 74.16 defines as the person contracting the drilling rig and/or the person who applies for an Authority to Construct for the well. The APCD issues portable Permits to Operate to the owners of drilling rigs. The California Air Resources Board Portable Equipment Registration (PERP) is not valid on an OCS platform; therefore, an APCD Permit to Operate is required for drilling rig engines.

This permit does not authorize the operation of any non-vehicular engine of 50 BHP, or greater, for well drilling or workover operations. Prior to using such an engine, the engine owner shall obtain a Permit to Operate for the engine, unless the engine qualifies for an exemption from the requirement to obtain a Permit to Operate under District regulations. A portable engine used to power an emergency drilling generator that is used only when electrical power line fails is exempt from permit pursuant to Rule 23.D.7.

Conditions:

1. Pursuant to Rule 74.16.B.1, all drilling operations shall be powered by grid power, unless exempted by Rule 74.16.C.1. Grid power is defined as electricity conveyed by power lines connected physically and contractually to the Southern California Edison System, or any electricity generated by equipment permitted by the District and having permitted emissions commensurate with an emissions rate of not more than 1.0 pound of NOx per megawatt-hour of electricity produced.

2. The District has concluded that it would not be cost effective to run grid power to Platform Gail and the permitted emissions of NOx from the Allison turbines are less than 515 ppmv corrected to 15% oxygen. Therefore, pursuant to Rule 74.16.C.1, the Allison

turbines may be used to supply electrical power during drilling operations in order to comply with Rule 74.16.B.2.a.

3. If the permittee elects to use drilling engines in place of the Allison turbines, then the following conditions apply:

   a. Pursuant to Rule 74.16.B.2.a, NOx emissions from these drilling engines, or any exhaust stack of multiple engines permanently manifolded together, shall not exceed 515 ppmv corrected to 15% oxygen. As an alternate, pursuant to Rule 74.16.B.2.c, drilling engines certified by the manufacturer to emit 6.9 grams of NOx per brake horsepower-hour or less based on a California ARB approved heavy duty offroad engine testing procedure shall be deemed in compliance with Rule 74.16.B.2.a, and shall not be subject to the annual source test requirements in Rule 74.16.B.2.b.

      In order to comply with this condition, permittee shall ensure that the drilling engine utilized has a valid APCD Permit to Operate and that the drilling engine has demonstrated compliance with Rule 74.16.B.2.a in accordance with CARB Method 100 as detailed in Rule 74.16.E (Test Methods), or has demonstrated compliance with Rule 74.16.B.2.c.

   b. In order to demonstrate compliance with Rule 74.16.B.2.a, the drilling rig company shall perform source testing on the drilling engine exhaust annually. Permittee shall obtain from the drilling rig company the most recent source test results for the engines subject to Rule 74.16.B.2.a, or the engine manufacturer certification for engines subject to Rule 74.16.B.2.c. This information shall be made available on site and submitted to the District upon request.

   c. Upon District request, the NOx emissions from the drilling engine exhaust shall be measured using CARB Method 100, in accordance with Rule 74.16.E (Test Methods).

Ventura County Air Pollution Control District
40 CFR Part 61, Subpart M Applicable Requirements
National Emission Standard for Asbestos

40 CFR Part 61, Subpart M, "National Emission Standard for Asbestos"
Federally-Enforceable

Applicability:

This attachment applies to short term activities conducted at this facility pertaining to procedures for asbestos demolition or renovation activities as detailed in 40 CFR Part 61.145.

As defined in 40 CFR Part 61.141, asbestos means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos containing material (RACM) from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

Conditions:

1. Permittee shall insure compliance with 40 CFR Part 61 Subpart M, "National Emission Standard for Asbestos". The owner or operator of a demolition or renovation activity, as defined in 40 CFR Part 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR Part 61.145, "Standards for Demolition and Renovation".

2. During times when asbestos renovation or demolition are underway at the facility, permittee shall ensure that all applicable requirements of 40 CFR Part 61.145 are met.

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11. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

Ventura County Air Pollution Control District
General Part 70 Permit Conditions

1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.B.1)

2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.

3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)

4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.B.2)

5. All required records, monitoring data, and support information shall be maintained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. Such reports shall identify any deviations from Part 70 permit conditions. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)

6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part 70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.B.5)

7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:

   a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;

   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;

   c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and

   d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

   (40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.7)

8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.B.3)

9. A Part 70 permit shall be reopened under the following conditions:

   a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;

   b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;

c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or

d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.B.6)

11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.B.4)

12. The provisions of this Part 70 permit shall be severable, and in the event of any challenge to any portion of the permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force. (40 CFR 70.6(a)(5), APCD Rule 33.3.B.8)

13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)

14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70 permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.5(d), APCD Rule 33.9.C)

15. Permittee shall submit a certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance was continuous or intermittent since the last certification, and the method(s) used to

determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.5(c)(9), 40 CFR 70.6(c)(5), APCD Rule 33.3.A.9, APCD Rule 33.9.B)

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Ventura County Air Pollution Control District
General Permit to Operate Conditions

1. Within 30 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)

2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)

3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)

4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

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Ventura County Air Pollution Control District
Permit Shield – Standards of Performance for Stationary Combustion Turbines
40 CFR Part 60, Subpart KKKK

40 CFR Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines"

Permit Shield:

The requirements of 40 CFR Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines" have been reviewed; and it has been determined that this federal regulation is not applicable to this stationary source. The following discussion details the determination of this permit shield for the three 4800 BHP Allison Turbines. The units are fired on natural gas or diesel fuel.

Discussion:

40 CFR Part 60, Subpart KKKK, is applicable to stationary combustion turbines with a heat input at peak load equal to or greater than 10 MMBTU/hr which commenced construction, modification, or reconstruction after February 18, 2005. The three Allison turbines are rated at approximately 50 MMBTU/hr; however, they were constructed prior to February 18, 2005. They have been permitted with the District since 1996. Authority to Construct No. 01494-370 was issued on May 16, 2006 for the installation of Selective Catalytic Reduction (SCR) systems at the turbines. The SCR installation does not meet the definition of "modification" as stated in 40 CFR Part 60 Subpart A; the SCR installation is also not a "reconstruction".

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Ventura County Air Pollution Control District
Permit Shield – National Emission Standards for Hazardous Air Pollutants
40 CFR Part 63, Subpart YYYY

40 CFR Part 63, Subpart YYYY, "National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines"

Permit Shield:

The requirements of 40 CFR Part 63, Subpart YYYY, "National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines" have been reviewed; and it has been determined that this federal regulation is not applicable to this stationary source. The following discussion details the determination of this permit shield for the three 4800 BHP Allison Turbines. The units are fired on natural gas or diesel fuel.

Discussion:

40 CFR Part 63, Subpart YYYY, is applicable to stationary combustion turbines that operate at a major source of HAP (Hazardous Air Pollutant) emissions. A stationary source is a major source of HAP emissions when the HAP emissions exceed thresholds of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. Emissions at Platform Gail do not exceed these HAP thresholds; therefore, Platform Gail is not a major source of HAP emissions. The HAP emissions for the stationary source are shown in the Reissuance Application.

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12. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label "Attachment 40CFR(Part No.) __" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
40 CFR Part 55 Applicable Requirements
Outer Continental Shelf Air Regulations

40 CFR Part 55, "Outer Continental Shelf Air Regulations"
Federally-Enforceable

Applicability:

This attachment applies to the stationary source since it is an existing outer continental shelf (OCS) source. 40 CFR Part 55 and related consistency updates detail the District rules that apply to OCS sources. Attachments contained in this permit use the term "Federally-Enforceable OCS Version" to designate those rules that are federally-enforceable at OCS sources via 40 CFR Part 55.

Conditions:

1. Permittee shall comply with 40 CFR Part 55, "Outer Continental Shelf Air Regulations". Permittee shall also comply with Rule 72.1, "Outer Continental Shelf Air Regulations". Rule 72.1 incorporates the following provisions of 40 CFR Part 55:

Section 55.1	Statutory authority and scope
Section 55.2	Definitions
Section 55.3	Applicability
Section 55.4	Requirement to submit a notice of intent
Section 55.5	Corresponding onshore area designation
Section 55.6	Permit requirements
Section 55.7	Exemptions
Section 55.8	Monitoring, reporting, inspections, and compliance
Section 55.9	Enforcement
Section 55.10	Fees
Section 55.13	Federal requirements that apply to OCS sources
Section 55.14 a,b,c	Requirements that apply to OCS sources located within 25 miles of states' seaward boundaries, by state

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Ventura County Air Pollution Control District
40 CFR Part 68 Applicable Requirements
Accidental Release Prevention and Risk Management Plans

40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"
Federally-Enforceable

Applicability:

This attachment applies to regulated substances that are contained in a process at this facility and that exceed the threshold quantity, as presented in 40 CFR Part 68.130. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

Conditions:

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

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Ventura County Air Pollution Control District
40 CFR Part 82 Applicable Requirements
Protection of Stratospheric Ozone

40 CFR Part 82, "Protection of Stratospheric Ozone"
40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"
40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"
Federally-Enforceable

Applicability:

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners", and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

As defined in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As defined in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person servicing, maintaining or repairing appliances, except for motor vehicle air conditioners. This subpart also applies to persons disposing of appliances, including motor vehicle air conditioners An appliance is any device which uses a class I or class II substance as a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.

Conditions:

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners".

   The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

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13. PART 70 PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit.

During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is included with the application. If the applicant was asked to replace a page or a portion of the application, the original submittal is stamped "REPLACED" and the replacement page or section is placed in front of the original. The applicant and District correspondence for the Part 70 permit application is located in the District permit file for this stationary source.